

LIST OF DEFENDANTS

N. B. ALL DEFENDANTS ARE EMPLOYED AT SCI-GREENE, 175 PROGRESS DRIVE,
WAYNESBURG, PA, 15370-8082

15-1031

NO.	NAME	JOB TITLE
1.	ROBERT D. GILMORE	WARDEN
2.	MS. TRACY SHAWLEY	WARDEN'S ASSISTANT
3.	S. P. DURCO	R.H.U. COMMANDER
4.	P. E. BARKKEFELT	R.H.U. LIEUTENANT
5.	A. J. MORRIS	RHU LIEUTENANT
6.	LT. WILLIAMS	RHU LIEUTENANT
7.	SGT. CRABLE	G BLOCK SERGEANT
8.	J. M. SMITH	G BLOCK SERGEANT
9.	ROBERT NELSON	CORRECTIONS OFFICER
10.	T. S. OSWALD	" "
11.	MR. COMER	" "
12.	T. I. BENNETT	G BLOCK PROPERTY OFFICER
13.	ROBERT HENDRICKS	CORRECTIONS OFFICER
14.	OFFICER CODDY	" "
15.	OFFICER HEGETER	" "
16.	D. FARRIER	" "
17.	M. STUMP	" "
18.	OFFICER, MS. TAIT	" "
19.	J. D. SUHAN	" "
20.	IRMA VIHLDAL	HEALTH CARE ADMINISTRATOR
21.	BYUNGHAK JIN	MEDICAL DIRECTOR
22.	M. PARK	DOCTOR
23.	P. DASCANT	" "
24.	MARY COMER	PHYSICIANS' ASSISTANT: PACS

STATEMENT OF ~~THE~~ CLAIMS

PHYSICIANS' ASSISTANT: PACS

(11)

2015-1031 W V G

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

OCT 22 2015

FILED

LIST OF DEFENDANTS

No.	NAME	DOB	TITLE
25.	MS. E. MATTES		PHYSICIANS ASSISTANT
26.	MS. ELON MWAURA		"
27.	REDACTED DENNISON (BIOLOGICAL BROTHER TO J.L. DENNISON)		CORRECTIONS OFFICER

#4 No Fee/No IFP 15BE/KCC
IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HENRY UNSELD WASHINGTON
PLAINTIFF

V.

ROBERT D. BILMORE
Defendants et al.

CIVIL ACTION NO. 15-1031

CIVIL COMPLAINT

RECEIVED

AUG - 7 2015

PLAINTIFF MOVES THIS COURT WITH A 42 U.S.C. 1983 CIVIL RIGHTS COMPLAINT. CLERK, U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

I. INTRODUCTION:

① HENRY UNSELD WASHINGTON ("WASHINGTON") BRINGS THIS ACTION, CHARGING THAT THE PENN-
SYLVANIA DEPARTMENT OF CORRECTIONS AND MANY OF ITS AFFILIATES AND OFFICERS LOCATED
STATEWIDE AND AT SCI-GREENE ("DEFENDANTS") PERMITTED AND ENCOURAGED UNLAWFUL
RETALIATION AGAINST WASHINGTON FOR HIS BRINGING LEGAL ACTION IN RESPONSE TO VIOLATIONS OF
HIS CIVIL RIGHTS.

② ADDITIONALLY, WASHINGTON ALLEGES THAT DEFENDANTS ^{FAILED} TO PROTECT HIM FROM PHYSICAL AND SEXUAL
ASSAULT, AND PERMITTED, ENCOURAGED, AND ENGAGED IN - DIRECTLY AND THROUGH NON-ACTION -
SEXUAL AND PHYSICAL ASSAULT OF HIM, SEXUAL HARASSMENT, RELIGIOUS PRACTICE, FINALLY, PLAIN-
TIF ALLEGES THAT DEFENDANTS DENIED HIM NECESSARY HEALTH CARE SERVICES

③ WASHINGTON HAS EXHAUSTED ALL AVAILABLE INTERNAL ADMINISTRATIVE REMEDIES AND THUS RE-
LIEF THROUGH THE COURTS IS HIS ONLY AVENUE FOR ADEQUATE REMEDY

II. JURISDICTION: ④ THIS COURT HAS JURISDICTION PURSUANT TO 42 U.S.C. § 1331. PLAINTIFF CLAIMS
THAT DEFENDANTS HAVE VIOLATED RIGHTS PROTECTED BY THE FIRST, EIGHTH, AND FOURTEENTH AMEND-
MENTS TO THE UNITED STATES CONSTITUTION. HIS CLAIM FOR DAMAGES IS BROUGHT PURSUANT
TO 42 U.S.C. 1983

⑤ VENUE IS PROPER UNDER 28 U.S.C. § 1391(B) BECAUSE ALL VIOLATIONS OF WASHINGTON'S RIGHTS
W.V. 6 ①

AS ALLEGED HEARING OCCURRED WITHIN THE WESTERN DISTRICT OF PENNSYLVANIA

III. PARTIES

- ⑥ HENRY UNSELD WASHINGTON IS AN ADULT MALE WHO IS CURRENTLY RESIDING AT THE STATE CORRECTIONAL INSTITUTION - SOMERSET (SCI-SOMERSET) IN SOMERSET COUNTY, PENNSYLVANIA
- ⑦ DEFENDANTS ARE ~~██████████~~ EMPLOYEES OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS AT SCI-GREENE IN GREENE COUNTY, PENNSYLVANIA AND OFFICIALS WITHIN THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS AND OFFICE OF PRISON MANAGEMENT

IV. FACTS

- ⑧ PLAINTIFF WASHINGTON WAS FIRST INCARCERATED IN PENNSYLVANIA IN 1980 AND WAS FIRST HELD AT SCI-DALLAS. IN 1994, HE WAS MOVED TO SCI-GREENE.
- ⑨ DURING THIS TIME, HE HAD HIS FIRST PROBLEMS WITH A GROUP OF GUARDS THAT LED TO ON GOING PROBLEMS WITH PRISON AUTHORITIES. THIS SITUATION DEVELOPED OUT OF WASHINGTON UMPIRING A PRISON SOFTBALL GAME BETWEEN PRISONERS AND GUARDS. THE PRISONERS WON THE GAME AND GUARDS RESPONDED THROUGH PHYSICAL ABUSE OF WASHINGTON. PRIOR TO THIS INCIDENT, FOR OVER FIFTEEN YEARS, WASHINGTON WAS A GOOD PRISONER WITH ONLY MINOR MISCONDUCTS ON HIS DISCIPLINARY RECORD.
- ⑩ WASHINGTON WAS TRANSFERRED FROM SCI-GREENE IN 1997, BUT RETURNED IN 2009.
- ⑪ THE STAFF OF SCI-GREENE WERE AWARE THAT WASHINGTON HAS ON GOING LITIGATION AGAINST PRISON OFFICIALS. THIS INCLUDES WASHINGTON V. FOLINO, 2:11-CV-1046, FILED IN 2011; WASHINGTON V. FOLINO, NO. 644 C.S. 2014, FILED IN 2014; WASHINGTON V. GRAME, 455 F. APPX 166 (3RD CIR 2011) FILED 2008; WASHINGTON V. KLEM, 497 F.3d 272 (3RD CIR 2007) FILED IN 2001. THE LATTER OF THESE IS A DEPRIVATION OF RELIGIOUS MATERIAL. GUARDS AT SCI-GREENE ARE AWARE OF BOTH OF THESE PIECES OF LITIGATION.
- ⑫ WASHINGTON IS DEFINED AS A "PAPER PUSHER" BY GUARDS AND STAFF AT SCI-GREENE. THEY RESPOND TO HIM WITH THIS IN MIND AND HAVE RETALIATED AGAINST HIM FOR FILING THESE LITIGATIONS AGAINST THEM PERSONALLY AND OTHER SCI-GREENE PRISON OFFICIALS.
- ⑬ IN THE COURSE OF THESE ACTIONS, PRISON OFFICIALS, INCLUDING DEFENDANTS, INCLUDING DR. JIN, BENNETT, OSWALD, STATED THAT THEIR ACTIONS WERE IN RESPONSE TO WASHINGTON "SUING W.V.G.

ME: "ATTACKED THE RHU STAFF FAMILY", WHEN PLAINTIFF SUED ONE HE SUED THEM, TOO, AND PENALIZE PLAINTIFF, THESE OFFICIALS OFTEN STATED THAT THEY WERE WORKING UNDER THE DIRECT ~~OF~~ ORDERS OF THEIR SUPERIORS IN CONNECTION TO WASHINGTON'S ON GOING LITIGATION, ONE PRISON OFFICIAL, M. PARK STATED 'YOU'RE SUING MY FAMILY, HE'S ONLY PROTECTING HIS FAMILY'

- (14). THE PRESENT ACTIONS TAKEN AGAINST WASHINGTON OCCURRED ONLY AFTER HE PURSUED LEGAL COMPLAINTS, GRIEVANCES, AND ACTIONS OF VARIOUS CONCERNS HE HAD, INCLUDING FILING A LEGAL ACTION FOR ACCESS TO HIS PERSONAL PROPERTY THAT WAS NECESSARY FOR HIS RELIGIOUS PRACTICE IN WASHINGTON V. KLEM,
- (15). PRISON OFFICIALS, INCLUDING DR. BYUNGHAK JIN, HAVE SEXUALLY HARASSED WASHINGTON, THIS OCCURRED ON NUMEROUS OCCASIONS, INCLUDING DURING AT LEAST ONE REQUEST FOR MEDICAL SERVICES
- (16). PRISON OFFICIALS HAVE MADE SEXUAL AND LEWD COMMENTS TOWARDS WASHINGTON IN AN EFFORT TO TO EMBARRASS, HARASS, AND UPSET HIM. FOR EXAMPLE, DR. JIN, SAID TO WASHINGTON IN 2013 DURING AN INSTANCE WHEN WASHINGTON WAS EXPERIENCING CLASSIC HEART ATTACK SYMPTOMS, "WHAT YOU NEED IS A GOOD SCREWING"
- (17). PRISON OFFICIALS, INCLUDING OFFICER T. S. OSWALD, HAVE ENGAGED IN UNWANTED TOUCHING AND BANTER OF A SEXUAL NATURE TOWARDS WASHINGTON, INCLUDING LEAVING WASHINGTON NUDE-N-BRAWLED OUT ON THE FLOOR IN NEED OF IMMEDIATE MEDICAL CARE, LAUGHING AS THEY WALKED AWAY
- (18). WHILE ESCORTING PLAINTIFF TO HIS CELL, ONE PRISON OFFICIAL, OSWALD, HAS RUBBED WASHINGTON'S BUTTOCK IN AN UNWELCOMED WAY AND MADE LEWD MEANING SOUND IN WASHINGTON'S EAR, SIMULATING AN ORGASM,
- (19). DURING SICK CALL, DR. P. DASCANI, WHILE WASHINGTON WAS EXPERIENCING EMERGENCY NEEDS REQUESTED SEX FROM WASHINGTON, DESPITE WASHINGTON BEING FOR MEDICAL CARE
- (20). WASHINGTON SUFFERS FROM A VARIETY OF MEDICAL CONDITIONS, INCLUDING, WHIPLASH DISEASE, DEMENTIA, DAMAGED VOCAL CORDS, URETHRAL STRICTURE, IRREVERSIBLE FOOT FUNGUS, TESTOSTERONE DEFICIENCY, CHRONIC FATIGUE-N-DIFFICULTY CONCENTRATING. ACCORDING TO PRISON OFFICIALS, HE HAS HAD AT LEAST TWO HEART ATTACKS, HE IS GOING BLIND IN HIS RIGHT EYE.
- (21). OVER THE PAST SIX YEARS, WASHINGTON HAS EXPERIENCED SUBSTANTIAL AND RAPID WEIGHT LOSS AS A RESULT OF HIS ON GOING HEALTH ISSUES.
- (22). PRISON DOCTORS AND OTHER MEDICAL PROFESSIONALS ACKNOWLEDGED WASHINGTON HEALTH

W. V. G

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NEEDS AND BLATANTLY CHOSE TO IGNORE THEM. ONE PRISON DOCTOR TOLD WASHINGTON DIRECTLY THAT HE IS NOT GOING TO WASTE TIME ON HELPING HIM

- (23). DR JIN, A PRISON DOCTOR WASHINGTON HAS HAD SEVERAL ISSUES WITH IN THE PAST, INSISTS ON BEING THE ONLY DOCTOR TO RESPOND TO ALL OF WASHINGTON'S ~~REQUESTS~~ REQUESTS FOR MEDICAL ASSISTANCE, DESPITE WASHINGTON'S REQUEST THAT HE NOT. MORE THAN ONCE HE HAS SEXUALLY AND PHYSICALLY ASSAULTED AND SEXUALLY HARASSED WASHENBTON. OTHER PRISONERS IN SOLITARY CONFINEMENT WERE TREATED BY MEDICAL STAFF OTHER THAN DR. JIN - N - DR. M. PARK UPON REQUEST, BUT WASHINGTON IS ROUTINELY DENIED
- (24). DR. JIN - N - DR PARK INFORMED WASHINGTON THAT SUING PRISON'S MEDICAL STAFF AND HIM MEANS THAT HE WILL NOT BE HELPED WITH HIS MEDICAL CONDITIONS, PRISON OFFICIALS WHO ATTEMPTED TO ASSIST WASHINGTON, WITH HIS MEDICAL NEEDS INCLUDING A MS. JENNIFER TRIMAI, HAVE BEEN KEPT AWAY FROM WASHINGTON BY DR JIN - N - DR. PARK, AND UPON INFORMATION AND BELIEF, WARDEN GILMORE
- (25). AT NO POINT HAS WASHINGTON EVER BEEN DISCIPLINED FOR VIOLENT BEHAVIOR, DRUGS, OR ANY OTHER SERIOUS CHARGE, NOR HAS HE EVER BEEN TRANSFERRED AS A RESULT OF A DISCIPLINARY ACTION
- (26). OUTSIDE OF STAFF'S POTENTIAL PERCEPTION OF WASHINGTON'S PURSUIT OF JUSTICE FOR ALLEGED VIOLATIONS OF HIS CIVIL RIGHTS, WASHINGTON HAS BEEN A MODEL PRISONER ^{DURING} ~~THE~~ THE 30 PLUS YEARS OF HIS INCARCERATION WITH LIMITED WRITE-UPS
- (27). DESPITE PLAINTIFF'S EXCELLENT PRISON RECORD WITH NO SIGNIFICANT DISCIPLINARY VIOLATIONS, WARDEN GILMORE HAS NONETHELESS KEPT WASHINGTON IN SOLITARY CONFINEMENT IN THE RESTRICTIVE HOUSING UNIT AT SCI-GREENE IN RETALIATION FOR WASHINGTON'S LITIGATION ACTIVITIES. WASHINGTON LIVED IN EXTRAORDINARILY RESTRICTIVE CONDITIONS OF 23-24 HOURS SOLITARY CONFINEMENT. HE IS NOT PERMITTED TO PARTICIPATE IN ANY PROGRAMMING OR CONGREGATE ACTIVITY
- (28). WASHINGTON EATS ALL MEALS IN HIS CELL
- (29). WASHINGTON IS SUBJECTED TO SEVERE RESTRICTIONS ON HIS VISITS, PHONE CALLS, PROPERTY, AND CORRESPONDENCE
- (30). EVERYTIME WASHINGTON EXITS HIS CELL HE IS FORCED TO UNDERGO A HUMILIATING VISUAL STRIP SEARCH AND MORE THAN ONCE FLUID, CONDOMS, DISINFECTANTS, AND TOBACCO

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CHEW HAS BEEN SPLASHED ON HIS GENITALS DURING THESE INSPECTIONS

- (31). DURING AT LEAST ONE OF SICK CALL RESPONSE DR. JEN, AND DR. DASCANI ~~WERE~~ INSTRUCTED WASHINGTON TO STRIP SEARCH N-DO SEXUAL POSTS, WHILE EXPERIENCING HEALTH SYMPTOMS THAT WOULD REQUIRE EMERGENCY MEDICAL CARE,
- (32). THE SOCIAL ISOLATION, LACK OF ENVIRONMENTAL STIMULATION, AND STRESS CAUSED BY SUCH RESTRICTIVE LIVING ~~CONDITIONS~~ CONDITIONS ARE EXACERBATING MENTAL AND PHYSICAL HEALTH CONDITIONS.
- (33). WASHINGTON WAS BEING KEPT IN LONG TERM SOLITARY CONFINEMENT WITHOUT A LEGITIMATE PENOLOGICAL JUSTIFICATION, HE, IN EARLY 70'S, NO HISTORY OF VIOLENCE, AND NUMBER OF SERIOUS HEALTH ISSUES
- (34). PRISON ADMINISTRATION, INCLUDING WARDEN GILMORE, HAVE BEEN REPEATEDLY ALERTED TO THOSE ON GOING ISSUES, THIS INCLUDES, BUT IS NOT LIMITED TO, PLAINTIFF'S FILING INTERNAL COMPLAINTS THROUGH THE GRIEVANCE SYSTEM; PLAINTIFF VERBALLY INFORMING THEM OF HIS ON GOING CONCERNS AND ASKING THEM TO STOP; THROUGH COMPLAINTS FILED IN FEDERAL COURT THAT OUTLINE PRIOR ISSUES THAT HAVE NEVER BEEN RECTIFIED
- (35). WARDEN GILMORE HAS BEEN DIRECTLY INVOLVED IN THESE ~~ON~~ ON GOING ISSUES THROUGH A LACK OF RESPONSE AND BLATANT INDIFFERENCE TO WASHINGTON'S PERSONAL AND MENTAL WELL BEING

V. CAUSES OF ACTION

COUNT I - RETALIATION

- (36). THE STATEMENT OF CLAIMS, AND PARAGRAPHS 1 THROUGH 35 ARE INCORPORATED BY REFERENCE ~~OF~~
- (37). THE CONDUCT WHICH LED TO THE RETALIATION AGAINST WASHINGTON IS A COMBINATION OF WASHINGTON'S ATTEMPT TO ACCESS THE COURTS TO ADJUDICATE ON GOING CIVIL RIGHTS CONCERNS, PROTECTED UNDER THE FIRST, FIFTH AND FOURTEENTH AMENDMENTS TO THE U.S. CONSTITUTION, AND HIS EFFORTS TO FULLY ENGAGE WITH HIS RELIGIOUS BELIEFS, AS REINFORCED THROUGH A SETTLEMENT AND PROTECTED UNDER 42 USC 2000cc, AND THE FIRST AMENDMENT OF THE CONSTITUTION
- (38). PRISON OFFICIALS AT SCI-GREENE, ALL STATE ACTORS SUBJECTED WASHINGTON TO ADVERSE ACTIONS,
- (39). THESE ADVERSE ACTIONS INCLUDED, BUT ARE NOT LIMITED TO, SEXUAL AND PHYSICAL ASSAULT, DENIAL OF MEANINGFUL HEALTH CARE, ACCESS TO COURT, BASELESS DISCIPLINARY WRITE

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UPS, DEROGATORY AND RACIST LANGUAGE, DENIAL OF RELIGIOUS PRACTICE

- (40). WASHINGTON'S CONDUCT PURSUING HIS CONSTITUTIONAL RIGHTS WAS REASONABLE.
- (41). A REASONABLE PERSON WOULD BE LIKELY TO BE DETERRRED FROM PURSUING THEIR RIGHTS UNDER THESE CONDITIONS
- (42). THE ACTIONS OF THESE PRISON OFFICIALS WERE DIRECTLY IN RESPONSE TO WASHINGTON'S ATTEMPT TO PURSUE HIS CONSTITUTIONAL RIGHTS
- (43). A CAUSAL LINK EXISTS BETWEEN WASHINGTON'S PURSUIT OF HIS CONSTITUTIONAL RIGHTS AND THE ADVERSE ACTIONS TAKEN BY PRISON OFFICIALS, AS DEMONSTRATED BY THE PROXIMITY OF THE ACTIONS TO WASHINGTON'S PURSUIT OF HIS RIGHTS AND VERBAL ACKNOWLEDGEMENT BY PRISON OFFICIALS
- (44). AS A RESULT OF DEFENDANT'S RETALIATION WASHINGTON'S ABILITY TO ADVANCE HIS CONSTITUTIONAL RIGHTS WAS INHIBITED IN THE FORM OF HIS INABILITY TO FULLY ENGAGE WITH HIS RELIGION, AS WELL AS PURSUE JUSTICE FOR HIS CIVIL RIGHTS VIOLATIONS WITHOUT FEAR OF FURTHER RETALIATION
- (45). RETALIATORY REPORTS LED TO PROLONGED WASHINGTON'S DURATION IN SOLITARY CONFINEMENT, WORSENING HIS HEALTH, CAUSING A SUBSTANTIAL RISK THAT HE WILL BE SUBJECTED TO GREATER HARM IN THE FUTURE.
- (46) WASHINGTON EXISTS IN A PERPETUAL CYCLE OF DESIRING TO SEEK A REMEDY TO THE VIOLATIONS OF RIGHTS, AS WELL AS A REMEDY TO HIS IMMEDIATE MEDICAL AND PHYSICAL NEEDS, BUT, SEEKING SUCH REMEDIES EXACERBATES THE RETALIATION HE ENDURES AND CAUSES THE PROBLEM TO WORSEN

COUNT II - FAILURE TO PROTECT FROM ABRAVATED AND SEXUAL ASSAULT

- (47) THE ATTACHED STATEMENT OF CLAIMS, AND PARAGRAPHS 1-THROUGH 46 ARE INCORPORATED BY REFERENCE.
- (48). PRISON OFFICIALS HAVE BEEN DELIBERATELY INDIFFERENT TO THE ONGOING MENTAL AND PHYSICAL ABUSE WASHINGTON HAS ENDURED, AND HAVE FAILED TO INTERVENE TO PROTECT HIM FROM HARM.
- (49). PRISON OFFICIALS, SPECIFICALLY DEFENDANT GILMORE, ARE FULLY AWARE OF THE SEXUAL AND ABRAVATED ASSAULT OF WASHINGTON. DESPITE WASHINGTON'S MANY COMPLAINTS ABOUT THESE MATTERS, DEFENDANTS HAVE FAILED TO PUT A STOP TO THESE ABUSES.
- (50). WASHINGTON'S ALREADY FRAGILE MEDICAL STATE HAVE BEEN EXACERBATED BY THE LACK OF INTERVENTION BY THE PRISON [REDACTED], ADMINISTRATION FOR ABUSES BY THEIR STAFF.
- (51). PRISON ADMINISTRATION ARE AWARE OF, OR [REDACTED] REASONABLY SHOULD BE AWARE OF, THE ONGOING PHYSICAL, MENTAL, AND SEXUAL ABUSE WASHINGTON IS SUBJECT TO, BUT HAVE ACTED WITH DELIBERATE INDIFFERENCE IN THEIR REFUSAL TO INTERVENE OR PREVENT IT.

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(52). RATHER, AT TIMES, PRISON OFFICIALS HAVE ACTED AS PARTY TO THE ABUSE AND HAVE CONDUCTED IT, BOTH THROUGH INACTION AND ENCOURAGEMENT

COUNT III - DENIAL OF HEALTH CARE SERVICES

(53). THE ATTACHED STATEMENT OF CLAIMS, AND PARAGRAPHS 1 - THROUGH 52 ARE INCORPORATED BY REFERENCE.

(54). DEFENDANTS, DIRECTLY AND THROUGH THEIR AGENTS, CONSISTENTLY DENIED WASHINGTON REQUESTED AND NECESSARY EMERGENCY MEDICAL TREATMENT AND HEALTH CARE SERVICES TO WASHINGTON DURING THE TIME IN QUESTION

(55). WHILE WASHINGTON DID RECEIVE AT TIMES WEEKLY VISITS BY PRISON MEDICAL PROFESSIONALS, THE MEDICAL CARE PROVIDED WAS ILLUSORY AND DID NOT FULFILL ~~THE~~ ^{THEIR} OBLIGATIONS ESTABLISHED UNDER THE EIGHTH AMENDMENT.

(56). PRISON MEDICAL OFFICIALS HAVE NOT ONLY ACTED IN DELIBERATE INDIFFERENCE TOWARDS THE HEALTH NEEDS OF WASHINGTON, BUT HAVE RESPONDED TO HIM WITH DELIBERATE ANIMOSITY BY TELLING HIM THEY WILL NOT WASTE THEIR TIME ON HIM AND ACKNOWLEDGING THAT HIS PURSUIT OF JUSTICE THROUGH THE ADMINISTRATIVE AVENUES OF THE DEPARTMENT OF CORRECTIONS AND JUDICIAL SYSTEM AFFECTS THE LEVEL OF ASSISTANCE THEY GIVE HIM

(57). PRISON OFFICIALS REFUSAL TO INTERVENE AND ENSURE THAT WASHINGTON RECEIVES HIS NECESSARY MEDICAL ATTENTION AMOUNTS TO DELIBERATE INDIFFERENCE

COUNT IV - DENIAL OF ACCESS TO THE COURT

(58). THE ATTACHED STATEMENT OF CLAIMS, AND PARAGRAPHS 1 THROUGH 57 ARE INCORPORATED ^{By REFERENCE} ~~INCORPORATED~~

(59). GILMORE, THROUGH HIS ROLE AS SUPERINTENDANT, AND HIS SUPERVISION OF HIS SUBORDINATES, MORE THAN ONCE DENIED WASHINGTON ACCESS TO THE COURTS, WASHINGTON WAS INFORMED BY PRISON OFFICIALS THAT HIS MAIL WAS NOT GOING OUT DUE TO THE ONGOING LITIGATION HE HAD AGAINST THE OFFICIALS,

(60). ON MORE THAN ON OCCASION, PRISON OFFICIALS, INCLUDING P/F BARKEFELT HAS SHOWN UP AT WASHINGTON'S CELL WITH A PIECE OF OUT GOING MAIL WASHINGTON HAD PLACED INTO THE OUT GOING MAIL MOMENTS EARLIER, THE PRISON OFFICIALS HAVE THEN, ON MORE THAN ~~ON~~ ONE OCCASION, RIPPED THE MAIL INTO PIECES IN FRONT OF WASHINGTON

(61). THIS, AND DENIAL WRITING PAPER CAUSING WASHINGTON'S CASE, WASHINGTON V. FOLINO, NO: 14-1980, ON APPEAL

(62). WASHINGTON'S RIGHTS OF ACCESS TO THE COURT AND FREE SPEECH WERE STIFLED ON MORE THAN ONE OCCASION IN A VINDICTIVE-N-INTENTIONAL WAY BY THE OFFICIAL OF THE STATE

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COUNT V. DENIAL OF ACCESS TO RELIGIOUS PROPERTY

- (63). THE ATTACHED STATEMENT OF CLAIMS, AND PARAGRAPHS 1 THROUGH 62 ARE INCORPORATED BY REFERENCE
- (64). IN A PRIOR SETTLEMENT AGREEMENT, PRISON OFFICIALS AGREED TO PROVIDE WASHINGTON WITH THE RELIGIOUS LITERATURE NEEDED ^{TO} CONDUCT THE DAILY RITUALS OF HIS RELIGION
- (65). PRISON OFFICIALS CONSISTANTLY FAILED TO PROVIDE WASHINGTON WITH ACCESS TO THIS LITERATURE ON A WEEKLY BASIS
- (66). DESPITE THEIR REQUIREMENTS TO UTILIZE THE LEAST RESTRICTIVE MEANS IN REGARDS TO ANY INFRINGEMENT UPON HIS RELIGIOUS NEEDS, PRISON OFFICIALS BLATANTLY DENIED WASHINGTON ACCESS TO THIS LITERATURE, DUE TO PLAINTIFF HAVING SUEO RHU STAFF, OR THEIR FAMILY

COUNT VI - CONSPIRACY

- (67). THE ATTACHED STATEMENT OF CLAIMS AND PARAGRAPH 1 THROUGH 66 ARE INCORPORATED BY REFERENCE,
- (68). DEFENDANTS OFTEN STATED THAT THEIR ACTIONS WERE BEING CONDUCTED PER THE ORDERS OF THEIR SUPERVISORS TO PENALIZE WASHINGTON FOR SUING THEM PERSONALLY, SCI-GREENE MEDICAL PROFESSIONALS, MEMBERS OF SCI-GREENE RHU STAFF, SCI-GREENE WARDEN, OR COMMUNICATIONS WITH THE DOJ.
- (69). PRISON OFFICIALS, AND THEIR SUPERVISORS REGULARLY STATED THEY HAD PLANNED, AND HAVING AGREED TO CARRY OUT ACTS TO PENALIZE WASHINGTON FOR HAVING SUEO THEM PERSONALLY, THE WARDEN, MEMBERS OF SCI-GREENE RHU STAFF, MEDICAL PROFESSIONALS, AND FOR COMMUNICATIONS WITH THE DOJ, AND TO DEPRIVE, PREVENT, AND DENY WASHINGTON HIS PROTECTED CONSTITUTIONAL RIGHTS

COUNT VII - EQUAL PROTECTION

- (70). THE ATTACHED STATEMENT OF CLAIMS, AND PARAGRAPHS 1-THROUGH 69, ARE INCORPORATED BY REFERENCE
- (71). PRISON OFFICIALS AND MEDICAL PROFESSIONALS CONSISTENTLY PROVIDED ALL OTHER RHU INMATES, ESPECIALLY WHITE INMATES ON SICK CALL, SUCCESSFULLY, AND PER CONSTITUTION; WHILE CONDUCTING THE SAME EVENT, BASED ON NON MEDICAL REASONS PRISON OFFICIALS-N-MEDICAL PROFESSIONALS DENIED WASHINGTON THE SAME CONSTITUTIONAL RIGHTS.
- (72). PRISON OFFICIALS-N-MEDICAL PROFESSIONALS CONSISTENTLY SINGLEO WASHINGTON OUT TO SUBJECT HIM-HER ABUSE UPON, THESE ARE ABUSES SCI-GREENE PRISON OFFICIALS-N-MEDICAL PROFESSIONALS, READILY WOULD OF, OR REASONABLY SHOULD HAVE FORESEEN, WOULD VIOLATE WASHINGTON CONSTITUTIONALLY PROTECTED RIGHTS, WHITE INMATES WERENT SUBJECTED TO THESE ABUSES, THESE ABUSES TO WASHINGTON WERE CONNECTED TO WASHINGTON'S ONGOING LITIGATION, SEVERAL PRISON OFFICIALS, AND MEDICAL PROFESSIONALS HAVE CONSISTENTLY STATED, SUING ~~ME-N-~~ SCI-GREENE RHU STAFF, "SUING ME-N-MEMBERS OF SCI-GREENE MEDICAL STAFF," PENALIZE PL-

AINTIFF FOR SUING THEM". THE PRISON OFFICIALS AND MEDICAL PROFESSIONALS OFTEN STATED THAT THEIR ACTIONS WERE UNDER DIRECT ORDERS OF THEIR SUPERVISORS.

- (73). PRISON OFFICIALS AND MEDICAL PROFESSIONALS CONSISTENTLY PROVIDED THE OTHER INMATES IN SOLITARY CONFINEMENT THEIR CONSTITUTIONAL RIGHTS, WHILE CONDUCTING THE SAME EVENT, PRISON OFFICIALS-N-MEDICAL PROFESSIONALS DENIED WASHINGTON THE SAME CONSTITUTIONAL RIGHTS.

VI. RELIEF

- (74). N.B. ALL REQUEST WHICH ARE BEYOND THE COURT AUTHORITY TO GRANT, CAN BE USED AS A REFERENCE IN THE CASE THERE IS A SETTLEMENT

- (75). WHEREFORE, ON THE BASIS OF THE FOREGOING, WASHINGTON ASK THE COURT TO

1. ASSUME JURISDICTION OF THIS CASE; REINSTATE WASHINGTON V. GRACE, 4:07-CV-0867; WASHINGTON V. GRACE, 4:08-CV-1283; WASHINGTON V. FOLINO, 2:11-CV-1046; WASHINGTON V. COMMONWEALTH OF PA, C.P. 51-CR-0404151, BACK ONTO THEIR RESPECTIVE DOCKETS
2. DECLARE DEFENDANTS' RETALIATORY ACTIONS AGAINST WASHINGTON TO BE UNCONSTITUTIONAL AND ENJOIN THEM ~~FROM~~ FOR COMMITTING SUCH ACTIONS IN THE FUTURE;
3. ORDER DEFENDANTS TO RELOCATE WASHINGTON TO SCI-PERRY, IN PERRY, FLA., OR A NEARBY FLA. PRISON; SCI-CHESTER, OR SCI-BRATFORD, BOTH LOCATED IN PA. DOC., WITH PERMANENT SINGLE CELL STATUS IN ORDER TO PROTECT WASHINGTON FROM THE ON GOING, AND FUTURE RETALIATORY ABUSES HE IS FORCED TO ENDURE
4. ENJOIN DEFENDANTS FROM CONTINUING TO RETURN WASHINGTON IN SOLITARY CONFINEMENT
5. ENJOIN PRISON OFFICIALS FROM REFUSING TO PROVIDE WASHINGTON WITH THE APPROPRIATE MEDICAL CARE HE NEEDS. IMMEDIATE PLACEMENT IN JOHN'S HOPKINS UNIVERSITY HOSPITAL FOR CARE BY OPTHALMOLOGISTS, CARDIOLOGISTS, UROLOGISTS, OTO LARYNGOLOGISTS, DENTIST, GASTROENTEROLOGIST
6. ENJOIN PRISON OFFICIALS FROM DENYING WASHINGTON FROM ACCESSING THE LITERATURE NECESSARY TO PRACTICE HIS RELIGIOUS BELIEF
7. AWARD WASHINGTON FINANCIAL DAMAGES IN THE AMOUNT OF \$5,000,000
8. AWARD WASHINGTON PUNITIVE DAMAGES IN THE AMOUNT OF \$5,000,000 AGAINST EACH DEFENDANT.
9. AWARD INJUNCTIVE RELIEF IN MONETARY VALUE OF \$500,000 AGAINST EACH DEFENDANT
10. IMMEDIATE INCREASE OF ^{STORAGE} ~~SPACE~~ SPACE CONCERNING THE DECATES OF WASHINGTON V. KLEIM

W V. G

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SETTLEMENT, TO WHICHEVER COMES ^{LAST} ~~100~~ "100 RECORD BOXES" OR "100,000 BOOKS"

11. PERMANENT OBSERVATION IN THE FORM OF OUTDOOR CELEBRATION CONCERNING ALL OF WASHINGTON'S RELIGIOUS HOLIDAYS AND FESTIVITIES ON AN ANNUAL BASIS
12. PERMANENT RESERVED SPACE IN THE CHAPEL FOR CONGREGATIONAL SERVICES ON A WEEKLY BASIS CONSISTING OF 3-HOURS SESSIONS
13. PERMANENT RESERVED SPACE IN THE CHAPEL FOR CHRISTIAN BLACK STUDIES ON A WEEKLY BASIS CONSISTING OF 3-HOURS SESSIONS
14. PERMANENT RESERVED SPACE IN THE CHAPEL FOR SEBA: SELF-ENHANCEMENT AWARENESS GROUP ON A WEEKLY BASIS CONSISTING OF 3-HOURS SESSIONS
15. PERMANENT ASSIGNED JOB INSIDE OF THE BYM OR CHAPEL CONSISTING OF 8 HOURS A DAY, 7 DAY WORK WEEK AT THE DOC MAXIMUM PAY RATE.
16. PERMANENT SUPPLEMENTARY DIET OF WASHINGTON OWN CHOOSING
17. PERMANENT CONJUGAL VISITS TWICE PER WEEK WITH SOMEONE OF PLAINTIFF OWN CHOOSING, CONSISTING OF 96 HOURS STRAIGHT PER VISIT
18. REPLACE OR PROVIDE PLAINTIFF WITH A T.V., RADIO, TYPEWRITER, FOOTLOCKER, AND WATCH CONSISTING OF MODELS OF WASHINGTON'S OWN CHOICE, WHETHER ON D.C. OR AC STATUS; OR IN GENERAL POPULATION OR ANY WHERE IN THE DOC, OR STATE INSTITUTION OR RESTRICTED HOUSING AREA
19. PERMANENT FREE CABLE T.V. FOR THE REMAINDER OF WASHINGTON'S LIFE, APPLY IRRESPECT OF GENERAL POPULATION, HOUSING AREA, STATE OF FEDERAL INSTITUTION, AC OR DC AREA
20. IMMEDIATE SURGERY TO RESTORE WASHINGTON'S PENIS TO ITS NORMAL SIZE OF "10 1/2 X 7"
21. PERMANENT EXTENDED COMMISSARY, IDLE PAY, TELEPHONE PRIVILEGES, ALL FOOD ITEM REMAIN IN CELL IRRESPECT LESS OF THE AMOUNT; HOUSING AREA, STATE OR FEDERAL INSTITUTION; APPLY IN ALL PA. PRISONS, AC AND DC STATUS
22. JURY TRIAL DEMANDED
23. IMMEDIATE COMMUTATION OF WASHINGTON'S LIFE SENTENCE, INCLUDING FULL RETIREMENT-N-MEDICAL CARE PLAN
24. AWARD WASHINGTON SUCH OTHER RELIEF AS IS NECESSARY

DATED: 7-18-15

"RESPECTFULLY SUBMITTED"
 S/ Henry Unself Washington
 HENRY UNSFELD WASHINGTON
 PM 3080
 PRO SE

W.V.G.

(10)

THIS CIVIL ACTION IS BROUGHT BY PRISON INMATE, HENRY UNSELD WASHINGTON, FILED PRO SE, PURSUANT TO 42 U.S.C. 1983, CIVIL RIGHTS COMPLAINT AGAINST EMPLOYED AT SCI-GREENE FOR VIOLATIONS OF PLAINTIFF FIRST, EIGHTH, AND FOURTEENTH AMENDMENTS

PLAINTIFF 1st, AND 14th AMENDMENTS WERE VIOLATED BY DEFENDANTS, ROBERT D. GILMORE, MS. TRACY SHAWLEY, S.P. DURCO, P.E. BARKER, A.J. MORRIS, LT. WILLIAMS, SGT. CRABLE, J.M. SMITH, ROBERT NELSON, T.S. OSWALD, MR. COMER, T.F. BENNETT, ROBERT HENDRICKS, OFFICER CODY, OFFICER HEBERT; D. FARRIER, M. STUMP, OFFICER MS. TAIT, J.D. SUHAN, IRMA VIHILDAL, BYUNGHAK JIN, M. PARK, P. DASCANI, MARY COMER, MS. E. MATTES, MS. ELON MWAURA, ~~OFFICER~~ DENNISON

PLAINTIFF 8th AMENDMENT WAS VIOLATED BY ROBERT NELSON, T.S. OSWALD, D. FARRIER, M. STUMP, J.D. SUHAN, BYUNGHAK JIN, M. PARK, P. DASCANI, MARY COMER, MS. E. MATTES, MS. ELON MWAURA, ~~OFFICER~~ DENNISON

I. DENIAL OF MEDICAL CARE

1. ON OR NEAR 7-8-13, DEFENDANT, B. JIN, DOCTOR, SICK CALL, GD 3 CELL, DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE
2. HAVING ACKNOWLEDGED HE FULLY UNDERSTOOD PLAINTIFF WAS EXPERIENCING INTENSE CHEST PAIN-N-DIFFICULTY BREATHING, EXCRUCIATING PAINFUL INTESTINAL GRIP, DIFFICULTY SPEAKING-N-CONCENTRATING, NEAR BLIND IN RIGHT EYE, DIARRHEA CAUSED BY FOOD SERVED TO INMATE, SWOLLEN ANKLES, DRIPPING SEMEN, MEMORY LOSS, CONTINUOUS NOSE BLEEDS-N-FATIGUE, DEMENTIA, TESTOSTERONE DEFICIENCY, URETHRAL STRICTURE, IRREVERSIBLE FOOT FUNGUS, DEFORMED FINGERS-N-ELBOWS
3. DEFENDANT, JIN, DECLARED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE.
4. DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM-N-THE WARDEN.

STATEMENT OF CLAIMS

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5. WALKED AWAY WHILE PLAINTIFF WAS CLUTCHING HIS CHEST WITH BOTH HANDS-N-GASPING FOR AIR
6. WITHOUT TAKING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-OR-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES OR PAP SMEAR
7. BASED ON NON MEDICAL REASONS DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE

N.B. ^{OF THIS} FOR THE SAKE ^{LEGAL} ACTION THROUGHOUT THE STATEMENT OF CLAIMS WHEN PLAINTIFF REFERS TO HIS CHRONIC ILLMENT THIS SHOULD BE INTERPRETED TO INCLUDE:

NON STOP EXCRUCIATING PAINFUL INTESTINAL GRIPE, DIFFICULTY BREATHING, SPEAKING-N-CONCENTRATING, NEAR BLIND IN RIGHT EYE, SWOLLEN ANKLES, DIARRHEA CAUSED BY FOOD SERVED TO INMATES, DRIPPING SEMEN, MEMORY LOSS, CONTINUOUS NOSE BLEEDS-N-FATIGUE, DEMENTIA, TESTOSTERONE DEFICIENCY, URETHRAL STRICTURE, IRREVERSIBLE FOOT FUNGUS, DEFORMED FINGERS-N-ELBOWS,

8. ON OR NEAR 7-26-13, DEFENDANT, B. JIN, DOCTOR, SICK CALL, BD-3, DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE. BASED ON NON MEDICAL REASONS:
9. HAVING ACKNOWLEDGED HE FULLY UNDERSTOOD PLAINTIFF PLAINTIFF WAS EXPERIENCING NON STOP EXCRUCIATING PAIN-N-DISCOMFORT CAUSED BY CHRONIC ILLMENT CITED ABOVE,
10. DEFENDANT, JIN, ASSESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED
11. HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM, AND THE WARDEN
12. WITHOUT TAKING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, HEART RATE, BREATHING PATTERN-N-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLE; OR PAP SMEAR
13. ON OR NEAR 8-23-13, DEFENDANT, B. JIN, DOCTOR, SICK CALL, BD 3 CELL, BASED ON NON MEDICAL REASONS DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE
14. PLAINTIFF EXPERIENCED NON STOP EXCRUCIATING PAIN-N-DISCOMFORT CAUSED BY ILLMENT CITED ABOVE. DEFENDANT, JIN ACKNOWLEDGED HE FULLY UNDERSTOOD, THEN RESPONDED ~~HE~~ PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, AND ACTED WITH DELIBERATE INDIFFERENCE
15. DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR STATEMENT OF CLAIMS:

SUING HIM-N-THE WARDEN

16. DEFENDANT, JIN WALKED AWAY WITHOUT CONDUCTING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES, PAP SMEAR

17. ON OR NEAR 8-29-13, DEFENDANT, M. PARK, DOCTOR, SICK CALL, 6D 3 CELL. BASED ON NON MEDICAL REASONS DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE

18. ACKNOWLEDGED HE FULLY UNDERSTOOD PLAINTIFF WAS EXPERIENCING INTENSE PAIN IN CENTER OF CHEST, AND EXCRUCIATING PAIN-N-DISCOMFORT NON STOP CAUSED BY CHRONIC AILMENTS CITED ABOVE.

19. DEFENDANT, PARK ~~PARK~~ PROFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WAS GOING TO PENALIZE PLAINTIFF FOR SUING HIM-N-HIS SUPERVISOR, DEFENDANT, B. JIN; BY DENYING PLAINTIFF MEDICAL CARE.

20. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF ON THE FLOOR GASPING FOR AIR; HAVING NOT CHECKED PLAINTIFF BLOOD PRESSURE, TEMPERATURE, HEART RATE, BREATHING PATTERN, DILATION OF PUPILS, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES, -N-PAP SMEAR

21. ON OR NEAR 9-5-13, DEFENDANT, B. JIN, DOCTOR, SICK CALL; 6D 3 CELL, DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL CARE

22. EXPERIENCING INTENSE CHEST PAIN, STRUGGLING TO BREATHE, TO THE EXTENT PLAINTIFF HAD TO LEAN ON THE WALL TO REMAIN UPRIGHT; NON STOP EXCRUCIATING PAIN-N-DISCOMFORT CAUSED BY THE AILMENT CITED ABOVE.

23. DEFENDANT, JIN ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING AND THE WARDEN

24. WALKED AWAY HAVING NOT CONDUCTED A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE, N-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES, N-PAP SMEAR

25. ON OR NEAR 9-26-13, DEFENDANT, B. JIN, DOCTOR, SICK CALL, 6D 3 CELL; DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASON.

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26. PLAINTIFF EXPERIENCED SHARP CHEST PAIN TO SUCH EXTENT PLAINTIFF HAD TO CRAWL TO THE DOOR, AND NON STOP EXCRUCIATING PAIN-N-DISCOMFORT CAUSED BY CHRONIC ILLMENT CITED ABOVE.
27. DEFENDANT, JIN ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM-N-THE WARDEN.
28. WITHOUT HAVING MADE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, HEART BEAT, BREATHING PATTERN-N-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES, -N- PAP SMEARS, DEFENDANT, JIN WALKED AWAY LEAVING PLAINTIFF ON HIS KNEES GASPING FOR AIR
29. ON OR NEAR 12-17-13, DEFENDANT, B. JIN, DOCTOR, SICK CALL, GD 3 CELL. DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.
30. EXPERIENCING SHARP CHEST PAIN, AND EXCRUCIATING PAIN-N-DISCOMFORT NON STOP, ^{CAUSED} ~~BY~~ CHRONIC ILLMENTS CITED ABOVE, DEFENDANT, JIN, ASSESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HE REFUSE TO PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM-N-THE WARDEN
31. DEFENDANT, JIN NEVER TOUCHED PLAINTIFF PHYSICALLY TO CONDUCT A CURSORY CHECK OF PLAINTIFF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE, -N- PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES, -N- PAP SMEAR. DEFENDANT, JIN WALKED AWAY LEAVING PLAINTIFF LYING NUDE ON THE FLOOR CLUTCHING HIS CHEST, MOUTH AGAPED WANTING FOR AIR
32. ON OR NEAR 12-19-13, DEFENDANT, B. JIN, DOCTOR, SICK CALL, GD 3 CELL. DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASON
33. ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE FOR NON STOP PAIN-N-DISCOMFORT EXCRUCIATINGLY, CAUSE BY CHRONIC ILLMENTS CITED ABOVE, THEN HE RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM-N-THE WARDEN.
34. HAVING NOT CONDUCTING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE, PUPIL DILATION, NO TEST IN LAB OF BLOOD, URINE, STOOL SAMPLE, -N- PAP SMEAR. DEFENDANT, JIN WALKED AWAY LEAVING IN THE NUDE, SLUMPED AGAINST THE WALL-N-DOOR, STRUGGLING TO BREATHE

35. ON OR NEAR 12-27-13, DEFENDANT, B. JIN, DOCTOR, SICK CALL, GD 3 CELL, DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASON
36. EXPERIENCING INTENSE CHEST PAIN; CHRONIC ILLMENTS CITED ABOVE CAUSING NON STOP EXCRUCIATING PAIN-N-DISCOMFORT DEFENDANT, JIN ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WAS PENALIZING PLAINTIFF FOR SUING HIM -N-THE WARDEN, SO HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE, DEFENDANT, JIN
37. REFUSED TO EVEN CONDUCT A CURSORY CHECK OF PLAINTIFF BLOOD PRESSURE, TEMPERATURE, HEART-RATE, BREATHING PATTERN, -N-PUPIL DILATION; NO LAB TEST OF BLOOD, URINE-STOOL SAMPLES OR PAP SMEAR; DEFENDANT JIN WALKED AWAY
38. ON OR NEAR 1-9-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GD 3, DENIED MEDICAL CARE BY DEFENDANT, PARK BASED ON NON MEDICAL REASON.
39. HAVING ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE DUE TO SHARP CHEST PAINS -N-DIFFICULTY BREATHING; AND NON-STOP PAIN -N-DISCOMFORT EXCRUCIATINGLY CAUSED BY THE CHRONIC ILLMENTS CITED ABOVE, THEN
40. DEFENDANT, PARK RESPONDED WITH DELIBERATE INDIFFERENCE, ~~HE~~ HOLDING A SCALPEL IN HAND INSTRUCTED PLAINTIFF TO COME TO THE DOOR, WHERE DEFENDANT, PARK SAID TO PLAINTIFF SEE THIS SCALPEL, FIRST THING HE WAS GOING TO SLIT PLAINTIFF THROAT FOR SUING HIM, AND DEFENDANTS, B. JIN -N- I. VOHLIDAL, AND R. GILMORE
41. FURTHERMORE HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE, DEFENDANT, PARK WALKED AWAY WITHOUT CONDUCTING A CURSORY CHECK ON PLAINTIFF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART-RATE -N-PUPIL DILATION; NO LAB TEST OF BLOOD, URINE, STOOL SAMPLE, OR PAP SMEAR
42. ON OR NEAR 1-24-14, DEFENDANT, ~~B. JIN~~ JIN, DOCTOR, SICK CALL, GD 3 CELL, DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASON.
41. AWARE PLAINTIFF WAS IN NON STOP EXCRUCIATING PAIN -N-DISCOMFORT CAUSED BY THE CHRONIC ILLMENTS CITED ABOVE DEFENDANT, JIN ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM

42. DEFENDANT, JIN, DID NOT MAKE A CURSORY EXAM OF PLAINTIFF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, PUPIL DILATION. PLAINTIFF BEGGED DEFENDANT, JIN FOR MEDICAL CARE, HE SANK TO THE FLOOR, HOLDING HIS CHEST, PANTING, DEFENDANT, JIN WALKED AWAY LEAVING PLAINTIFF SPRAWLED OUT ON THE FLOOR

43. ON OR NEAR 2-21-14, DEFENDANT, MS. M. COMER, PAC, SICK CALL, GD 3 CELL. DEFENDANT, MS. COMER, BASED ON NON-MEDICAL REASON DENIED PLAINTIFF MEDICAL CARE.

44. DEFENDANT, MS. COMER, PROFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE IN LIGHT OF PLAINTIFF EXPERIENCING SHARP CHEST PAIN - N- DIFFICULTY BREATHING TO THE EXTENT PLAINTIFF STRUGGLED TO REMAIN UPRIGHT; AND CHRONIC ILLMENTS CAUSING NON STOP EXCRUCIATING PAIN - N- DISCOMFORT; CITED ABOVE

45. THEN, DEFENDANT, COMER RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED SHE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HER SUPERVISOR, DEFENDANT, B. JIN, HAVING NOT CONDUCTED A CURSORY CHECK OF PLAINTIFF BLOOD PRESSURE, TEMPERATURE, HEART RATE, BREATHING PATTERN - N- PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES - N- PAP SMEAR

46. DEFENDANT, MS. COMER WALKED AWAY LEAVING PLAINTIFF BEGGING HER FOR MEDICAL CARE, IN NON STOP EXCRUCIATING PAIN - N- DISCOMFORT, STRUGGLING TO REMAIN UPRIGHT - N- BREATH

47. ON OR NEAR 4-30-14, DEFENDANT, B. JIN, DOCTOR, SICK CALL, GA 20 CELL, DEFENDANT, JIN DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

46. PLAINTIFF UNABLE TO RAISE HIS ABOVE A WHISPER, EXPERIENCING NON STOP EXCRUCIATING PAIN - N- DISCOMFORT DUE TO CHRONIC ILLMENTS CITED ABOVE, DEFENDANT ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN HE RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HIS WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM - N- THE WARDEN

47. WITHOUT CONDUCTING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, HEART RATE, BREATHING PATTERN - N- PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLE, OR PAP SMEARS; DEFENDANT, JIN WALKED AWAY LEAVING PLAINTIFF NUDE, UNABLE TO SPEAK ABOVE A WHISPER, and IN NON STOP EXCRUCIATING PAIN - N- DISCOMFORT

48. ON OR NEAR 5-2-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, BA 20 CELL, DEFENDANT, PARK

DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

49. DEFENDANT, PARK ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE FOR CHRONIC AILMENTS CITED ABOVE CAUSING NON STOP EXCRUCIATING PAIN-N-DISCOMFORT THEN HE RESPONDED WITH DELIBERATE INDIFFERENCE

50. DECLARE HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM, AND DEFENDANTS, R. GILMORE, B. JIN-N-I. VIHLIDAL, DEFENDANT, PARK WALKED AWAY DENYING PLAINTIFF MEDICAL CARE NOT HAVING CONDUCTED A CURSORY CHECK FOR BLOOD PRESSURE, TEMPERATURE, HEART RATE, BREATHING PATTERN-N-PUPIL DILATION; NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES-N-PAP SMEAR AND SWAB

51. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF GASPING FOR AIR, ON BOTH KNEES DUE TO LACK OF STRENGTH, IN NON STOP EXCRUCIATING AND DISCOMFORT, BEGGING FOR MEDICAL CARE

52. ON OR NEAR 5-12-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, BA 20 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

53. AWARE PLAINTIFF EXPERIENCED NON STOP EXCRUCIATING PAIN-N-DISCOMFORT DUE TO CHRONIC AILMENTS CITED ABOVE DEFENDANT, PARK ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN DECLARED WITH DELIBERATE INDIFFERENCE.

54. HE DECLARE HE WAS NOT PROVIDING MEDICAL CARE TO PLAINTIFF TO PENALIZE PLAINTIFF FOR SUING HIM, AND DEFENDANTS, R. GILMORE, B. JIN-N-I. VIHLIDAL, WITHOUT CONDUCTING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING, HEART RATE-N-PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, STOOL SAMPLES, -N-PAP SMEAR-N-SWABB. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF ON THE FLOOR WEDGED BETWEEN THE DOOR-N-DOOR FRAME, IN NON STOP EXCRUCIATING PAIN-N-DISCOMFORT BEGGING FOR MEDICAL CARE, MOUTH AGAPE STRUGGLING TO BREATHE

55. ON OR NEAR 5-16-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, BA 20-CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

56. DUE TO CHRONIC AILMENTS CITED ABOVE, PLAINTIFF EXPERIENCED NON STOP EXCRUCIATING PAIN-N-DISCOMFORT, SO WEAK PLAINTIFF USED ~~THE~~ THE WALL TO REMAIN STANDING, DEFENDANT, PARK ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE,

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57. THEN DEFENDANT, PARK RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HE WOULD NOT PROVIDE MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM; REFUSED TO CONDUCT A CURSORY CHECK OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE, -N- PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, AND STOOL SAMPLE; SWAB -N- PAP SMEAR
58. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN, TOO WEAK TO STAND WITHOUT THE AID OF THE WALL, BEGGING FOR MEDICAL CARE.
59. ON OR NEAR 5-27-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 20 CELL. DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.
60. DEFENDANT, PARK ACKNOWLEDGED HE FULLY UNDERSTOOD PLAINTIFF, WHO WAS BARELY AUDIBLE, UNABLE TO STAND; ON HIS KNEES RESTING HIS HEAD ON THE BED PANTING BEGGING FOR MEDICAL CARE; IN NON STOP EXCRUCIATING PAIN CAUSED BY CHRONIC ILLMENTS CITED ABOVE.
61. DEFENDANT, PARK, ASSESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE; THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARE HE WAS GOING TO PENALIZE PLAINTIFF FOR SUING HIM; BY DENYING PLAINTIFF MEDICAL CARE.
62. DEFENDANT, PARK, WITHOUT CONDUCTING A CURSORY CHECK OF BLOOD PRESSURE, BREATHING PATTERN, TEMPERATURE, HEART RATE -N- PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, SWAB, STOOL SAMPLES -N- PAP SMEAR,
63. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF ON HIS KNEES BEGGING FOR MEDICAL CARE.
64. ON OR NEAR 6-12-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 20 CELL. DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.
65. DEFENDANT, PARK ACKNOWLEDGED HE FULLY UNDERSTOOD PLAINTIFF EXPERIENCE NON STOP EXCRUCIATING PAIN -N- DISCOMFORT CAUSED BY CHRONIC ILLMENTS CITED ABOVE, HE ASSESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE.
66. DEFENDANT, PARK DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE AS A WAY OF ~~PENALIZING~~ PENALIZING FOR SUING HIM, WALKED AWAY LEAVING PLAINTIFF IN NON STOP PAIN
67. WITHOUT CONDUCTING A CURSORY CHECK OF BLOOD PRESSURE, HEART RATE, TEMPERATURE, BREATHING PATTERN, -N- PUPIL DILATION; NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES; SWAB -N- PAP SMEAR.

68. ON OR NEAR 6-13-14, DEFENDANT, B. JIN, DOCTOR, SICK CALL, GA 20 CELL. DEFENDANT JIN DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

69. FOLLOWING A COLLAPSE PLAINTIFF MADE DEFENDANT ^{JIN} AWARE THAT HE WAS IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT DUE TO CHRONIC AILMENTS CITED ABOVE, WHICH CAUSED THE COLLAPSE.

70. DEFENDANT, JIN ACKNOWLEDGED HE FULLY UNDERSTOOD, PROFFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE.

71. THEN DEFENDANT, JIN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM, THEN WITHOUT CONDUCTING A CURSORY CHECK OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLE, SWAB-N-PAP SMEAR;

72. DEFENDANT, JIN WALKED AWAY LEAVING PLAINTIFF FALLING AGAIN TO THE FLOOR, STRUGGLING TO BREATHE, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING FOR MEDICAL CARE.

73. ON OR NEAR 6-23-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA-20 CELL. DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

74. DEFENDANT, PARK ACKNOWLEDGED HE FULLY UNDERSTOOD PLAINTIFF WAS EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, CAUSED BY CHRONIC AILMENTS CITED ABOVE,

75. DEFENDANT, PARK PROFFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED, HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE FOR SUING HIM.

76. NOT HAVING CONDUCTED A CURSORY CHECK OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES, SWAB-N-PAP SMEAR; DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-DISCOMFORT, STRUGGLING TO BREATHE.

77. ON OR NEAR 6-26-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 20 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

78. HAVING ACKNOWLEDGED PLAINTIFF WAS EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC AILMENTS CITED ABOVE.

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79. DEFENDANT, PARK PROCLAIMED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM
80. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF LYING FACE DOWN ON THE FLOOR, GASPING FOR AIR, PLEADING FOR MEDICAL CARE; IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT; NOT HAVING CONDUCTED A CURSORY CHECK FOR HIGH BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES, SWAB-N-PAP SMEAR
81. ON OR NEAR 6-27-14, DEFENDANT, M. PARK, DOCTOR, STICK CALL, GA 20 CELL. DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE, BASED ON NON MEDICAL REASONS,
82. PLAINTIFF EXPERIENCE NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY THE CHRONIC ILLMENTS CITED ABOVE; TO THE EXTENT PLAINTIFF HAD TO USE THE WALL-N-DOOR FRAME TO REMAIN UPRIGHT, DEFENDANT, PARK ACKNOWLEDGED HE FULLY UNDERSTOOD.
83. DEFENDANT, PARK PROCLAIMED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM
84. WITHOUT CONDUCTING A CURSORY CHECK OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB TEST OF BLOOD, URINE, STOOL SAMPLE, SWAB-N-PAP SMEAR; DEFENDANT, PARK WALKED AWAY WITHOUT HAVING TOUCHED PLAINTIFF PHYSICALLY, LEAVING PLAINTIFF BEGGING FOR MEDICAL CARE WHILE IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT
85. ON OR NEAR 7-11-14, DEFENDANT, M. PARK, DOCTOR, STICK CALL, GA 16 CELL. DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE. BASED ON NON-MEDICAL REASON.
86. WHILE UNABLE TO STAND UPRIGHT, IN DETAIL DEFENDANT, PARK WAS MADE AWARE PLAINTIFF WAS EXPERIENCING NON STOP EXCRUCIATING PAIN-N-DISCOMFORT CAUSED BY CHRONIC ILLMENTS CITED ABOVE, DEFENDANT, PARK PROCLAIMED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE
87. DEFENDANT, PARK, DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE, WALKED AWAY LEAVING PLAINTIFF CLINGING TO WALLS-N-DOOR FRAME TO REMAIN UPRIGHT

HAVING MOUTH AGAPED TO BREATHE, PLEADING FOR MEDICAL CARE, WHILE IN NON STOP EXCRUCIATING PAIN;

88. HAVING NOT TOUCHED PLAINTIFF PHYSICALLY TO CONDUCT A CURSORY CHECK FOR BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE, N-PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES, SWAB-N-PAP SMEAR
89. DEFENDANT, PARK, SHOUTED, HE DENIED PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM,
90. ON OR NEAR 7-14-14, DEFENDANT PARK, DOCTOR, SICK CALL, GA 16 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.
91. WHILE EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC ILLMENTS CITED ABOVE, MAKING IT DIFFICULT FOR PLAINTIFF TO STAND UPRIGHT, DEFENDANT, PARK PROFESSED TO FULLY UNDERSTAND, AND PROCLAIMED PLAINTIFF HEALTH PROBLEMS WARRANTED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE
92. DEFENDANT, PARK, DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM, WITHOUT HAVING CONDUCTED A CURSORY CHECK ON BLOOD PRESSURE, TEMPERATURE, HEART RATE-N-PUPIL DILATION, BREATHING PATTERN; NO LAB TEST OF BLOOD, URINE STOOL SAMPLES, SWAB-N-PAP SMEAR
93. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF PANTING, STRUGGLING TO REMAIN UPRIGHT, IN STOP EXCRUCIATING PAIN-N-DISCOMFORT, AND BEGGING FOR MEDICAL CARE
94. ON OR NEAR 7-18-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 16 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.
95. AFTER PERSONALLY WITNESSING PLAINTIFF COLLAPSE DUE TO NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC ILLMENTS CITED ABOVE DEFENDANT, PARK PROFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE
96. DEFENDANT, PARK, DECLARED HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM. THEN WITHOUT CONDUCTING A CURSORY CHECK ON BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL

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DILATION, NO LAB TEST OF BLOOD, URINE, STOOL SAMPLES, SWAB-N-PAP SMEAR; HE WALKED AWAY

97. DEFENDANT, PARK, WALKED AWAY LEAVING ~~PLAINTIFF~~ ~~PLAINTIFF~~ PLAINTIFF BEGGING HIM FOR MEDICINE FOR PAIN, THESE PLEADS ALL FELL ON DEAF EARS, AS DEFENDANT, PARK KEPT WALKING LEAVING PLAINTIFF ON HANDS-N-KNEES IN EXCRUCIATING NON STOP PAIN-N-EXTREME DISCOMFORT

98. ON OR NEAR 7-21-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 16 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

99. ~~PLAINTIFF~~ HAVING NO SIGHT IN RIGHT EYE DEFENDANT, PARK ACKNOWLEDGED THIS, AND HE ALSO ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE FOR HIS EYE; AND THE NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC ILLMENT CITED ABOVE;

100. THEN DEFENDANT, PARK RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM. HAVING NOT CONDUCTED A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, HEART RATE, BREATHING PATTERN-N-PUPIL DILATION, NO TEST ORDERED ON BLOOD, URINE, STOOL SAMPLES, SWAB-N-PAP SMEAR.

101. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF UNABLE TO SEE OUT OF HIS RIGHT EYE, DRIPPING SEMEN, WHILE IN EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, PANTING, BEGGING FOR MEDICAL CARE

102. ON OR NEAR 7-24-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 16 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

103. PLAINTIFF SO WEAK CAN BARELY STAND, STRUGGLING TO BREATHE; EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC ILLMENTS CITED ABOVE

104. DEFENDANT, PARK PROFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM.

105. WITHOUT CONDUCTING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO ~~LAB~~ LAB TEST ON BLOOD, URINE, STOOL SAMPLES, SWAB-N-PAP SMEAR, DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF CLUTCHING HIS DOOR FRAME TO KEEP FROM FALLING TO THE FLOOR DUE TO LACK OF STRENGTH, PANTING, WHILE IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, AND BEGGING DEFENDANT, PARK FOR MEDICAL CARE.

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106. ON OR NEAR 7-25-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 16 CELL. DEFENDANT, PARK DENIED PLAINTIFF-

~~DEFENDANT, PARK~~ MEDICAL CARE BASED ON NON MEDICAL REASONS

107. DEFENDANT, PARK DISCOVERED PLAINTIFF ON THE FLOOR TOO WEAK TO GET ON HIS FEET, CAUSED BY THE CHRONIC ILLMENTS CITED ABOVE. DEFENDANT, PARK ASSESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE. DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM

108. DEFENDANT, PARK, WITHOUT CONDUCTING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO LAB TEST ON BLOOD, URINE, STOOL SAMPLES, SWAB-N-PAP SMEAR

109. DEFENDANT, PARK WALKED AWAY WHILE PLAINTIFF ON THE FLOOR, MOUTH ABAPE, STRUGGLING TO BREATHE-N-TO SPEAK, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT.

110. ON OR NEAR 8-7-14, DEFENDANT, B. JIN, DOCTOR, SICK CALL, GA 16 CELL. DEFENDANT, JIN DENIED PLAINTIFF- MEDICAL CARE BASED ON NON MEDICAL REASONS.

111. TOO WEAK TO STAND UPRIGHT, HAVING TO WALK BENDING AT THE WAIST TO COME TO THE DOOR WITH DEFENDANT, JIN PER DEFENDANT, JIN'S REQUEST WHEREIN PLAINTIFF DETAILED HIS CHRONIC ILLMENTS CITED ABOVE, DEFENDANT, JIN PROFFESSED HE FULLY UNDERSTOOD

112. DEFENDANT, JIN, EXCLAIMED YOU SERIOUSLY NEED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM. DEMANDED PLAINTIFF REMOVE ALL OF HIS CLOTHES.

113. WITHOUT CONDUCTING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE, -N- PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, STOOL SAMPLES, SWAB-N-PAP SMEAR DEFENDANT, JIN WALKED AWAY LEAVING PLAINTIFF ON THE FLOOR TOO WEAK TO PULL HIS PANTS UP- UNABLE TO STAND UPRIGHT, BEGGING DEFENDANT, JIN FOR MEDICAL CARE, NEAR BLIND IN RIGHT EYE, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT

114. ON OR NEAR 8-8-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 16 CELL. DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE, BASED ON NON MEDICAL REASONS.

115. ACKNOWLEDGED PLAINTIFF CHRONIC ALLMENTS CITED ABOVE CALLED FOR IMMEDIATE STATEMENT OF CLAIMS

- EMERGENCY MEDICAL CARE, DEFENDANT, PARK THEN RESPONDED WITH DELIBERATE INDIFFERENCE. DEFENDANT, PARK DECLARED HE WAS GOING TO PENALIZE PLAINTIFF FOR SUING HIM, THEN ~~HE~~ DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE. DID NOT CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, HEART RATE, BREATHING PATTERN-N-PUPIL DILATION; NO TEST IN LAB ON BLOOD, URINE, STOOL, SWAB SAMPLES-N-PAP SMEAR
116. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF LYING AGAINST THE WALL TOO WEAK TO STAND, STRUGGLING TO BREATHE, BEGGING DEFENDANT, PARK FOR MEDICAL CARE; IN EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, NON STOP
117. ON OR NEAR 8-25-14, DEFENDANT, MS. E. MATTES, PAC, SICK CALL, GA 16 CELL. DEFENDANT, MS. MATTES DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.
118. ACKNOWLEDGED PLAINTIFF CHRONIC AILMENTS BEING CITED ABOVE WARRANTED IMMEDIATE EMERGENCY MEDICAL CARE DEFENDANT, MS MATTES RESPONDED WITH DELIBERATE INDIFFERENCE. DECLARE SHE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE, TO PENALIZE PLAINTIFF FOR SUING HIM
119. PLAINTIFF SO IN PAIN-N-WEAK HE HAD TO CRAWL TO THE DOOR; YET DEFENDANT, MS. MATTES DID NOT MAKE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, SWAB, STOOL SAMPLES N-PAP SMEAR
120. DEFENDANT, MS. MATTES WALKED AWAY LEAVING PLAINTIFF TOO WEAK TO RISE TO HIS FEET, NEAR BLIND IN RIGHT EYE, STRUGGLING TO SPEAK-N-BREATHE, IN EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DEFENDANT, MS. MATTES FOR MEDICAL CARE.
121. ON OR NEAR 9-8-14, DEFENDANT, MS. E. MATTES, PAC, SICK CALL, GA 16 CELL. DEFENDANT, MS. MATTES DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL CARE.
122. ACKNOWLEDGED PLAINTIFF CHRONIC AILMENTS CITED ABOVE WARRANTED IMMEDIATE EMERGENCY MEDICAL CARE, DEFENDANT, MS. MATTES RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED SHE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE, TO PENALIZE PLAINTIFF FOR SUING HIM.
123. DEFENDANT, MATTES DID NOT MAKE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, HEART RATE, BREATHING PATTERN-N-PUPIL DILATION; NO LAB TEST OF BLOOD, URINE, SWAB-STOOL SAMPLES-N-PAP SMEAR
124. DEFENDANT, MS. MATTES WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DEFENDANT, MS. MATTES FOR MEDICAL CARE.

CIATING PAIN-N-EXTREME DISCOMFORT TO THE EXTENT HE WAS BENDING AT THE WAIST, GASP-
ING FOR AIR, BEGGING FOR DEFENDANT, MATTES TO GIVE HIM MEDICINE FOR PAIN

125. ON OR NEAR 9-15-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, BA 16 CELL. DEFENDANT, PARK
DENIED MEDICAL CARE TO PLAINTIFF BASED ON NON MEDICAL REASONS.

126. DEFENDANT, PARK DECLARED, HE WAS TOTALLY CONVINCED PLAINTIFF ~~CHRONIC~~ CHRONIC
AILMENTS CITED ABOVE, NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RE-
SPONDED WITH DELIBERATE INDIFFERENCE, EXCLAIMED, "BUT I WILL NOT GIVE IT
TO YOU. I WANT YOU TO SUFFER, TO PENALIZE YOU FOR SUING ME"

127. DEFENDANT, PARK DID NOT TAKE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATH-
ING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, SWAB, PAP
SMEAR-N-STOOL SAMPLES

128. DEFENDANT, PARK, DECLARED A DESIRE TO MAKE PLAINTIFF SUFFER, HE WALKED AWAY
LEAVING PLAINTIFF HAVING TO REST ON ONE KNEE, TO BREATHE, IN NON STOP EXCRUCIATING
PAIN-N-EXTREME DISCOMFORT, BEGGING DEFENDANT, PARK FOR MEDICINE TO EASE THE PAIN.

129. ON OR NEAR 9-19-14, DEFENDANT, P. DASCANI, DOCTOR, SICK CALL, BA 16 CELL, DEFEND-
ANT, DASCANI DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

130. DEFENDANT, DASCANI ACKNOWLEDGED HE FULLY UNDERSTOOD PLAINTIFF WAS UNABLE TO SEE
OUT HER RIGHT EYE; AND NEEDED IMMEDIATE EMERGENCY MEDICAL CARE FOR CHRONIC
AILMENTS CITED ABOVE; THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED
"HE WAS TELLING PLAINTIFF FROM THE START, HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE, TO
PENALIZE PLAINTIFF FOR SUING HIM, SO
IT WAS A WASTE OF TIME FOR PLAINTIFF TO TELL HIM HIS MEDICAL NEEDS."

131. ACCORDING TO DEFENDANT, DASCANI, HE WAS GIVEN DIRECT ORDERS BY DEFENDANT, B. JIN-N-
M. PARK, NOT TO DO A DAM THING FOR PLAINTIFF; DEFENDANT, DASCANI DID NOT TAKE A CUR-
SORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION; NO
LAB TEST ON BLOOD, URINE, SWABS, PAP SMEAR-N-STOOL SAMPLES

132. DEFENDANT, DASCANI WALKED AWAY LEAVING PLAINTIFF WITH A LOSS OF EYE SIGHT IN RIGHT EYE,
UNABLE TO EAT WITHOUT EXPERIENCING A FIT OF DIARRHEA; IN NON STOP EXCRUCIATING PAIN-N-EXTREME
DISCOMFORT, BEGGING FOR MEDICAL CARE.

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133. ON OR NEAR 9-22-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 16 CELL. DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL CARE.
134. PLAINTIFF EXPLAINED IN SPECIFICS, AND DEFENDANT, PARK DECLARED HE FULLY UNDERSTOOD THAT PLAINTIFF HAD LOSS ALL SIGHT IN HIS RIGHT EYE, AND PLAINTIFF EXPERIENCED NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT CAUSED BY CHRONIC ALLMENTS CITED ABOVE.
135. DEFENDANT, PARK PROFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM
136. DEFENDANT, PARK, WITH PLAINTIFF BEGGING HIM FOR MEDICAL CARE; HE DID NOT MAKE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, SWABS, PAP SMEAR-N-STOOL SAMPLES
137. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF WITH NO EYESIGHT IN RIGHT EYE, STRUGGLING TO BREATHE, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DEFENDANT, PARK TO GIVE HIM MEDICINE TO EASE THE PAIN,
138. ON OR NEAR 9-26-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA-16 CELL. DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS
139. WITH A LOSS OF SIGHT IN RIGHT EYE, AND CHRONIC ALLMENTS CITED ABOVE DEFENDANT, PARK ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HE WOULD NOT PROVIDE PLAINTIFF WITH MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM
140. WITHOUT CONDUCTING A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE, N-PUPIL DILATION; NO LAB TEST OF BLOOD, URINE, SWAB, PAP SMEARS-N-STOOL SAMPLES DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF BLIND IN RIGHT EYE, EXPERIENCING DIARRHEA, STRUGGLING STAND UPRIGHT, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DEFENDANT, PARK TO GIVE HIM MEDICINE TO EASE THE PAIN
141. ON OR NEAR 9-26-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 16 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.
142. PLAINTIFF EXPERIENCED NO EYE SIGHT PERIODICALLY IN RIGHT EYE; AND CHRONIC ALLMENT STATEMENT OF ~~THE~~ CLAIMS

CITED ABOVE. DEFENDANT, PARK ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED, "BECAUSE I AM PENALIZING YOU FOR SUING ^{ME} THEY COULDN'T PAY ME TO PROVIDE YOU MEDICAL CARE"

143, PLAINTIFF SAID TO DEFENDANT, PARK, "I CAN'T SEE AT ALL OUT OF MY RIGHT EYE APPROXIMATELY 18 HOURS OUT OF EACH DAY, I AM GOING BLIND IN MY RIGHT EYE." LAUGHING UNCONTROLLABLY DEFENDANT, PARK, STATED, "I AM GLAD"

144, DEFENDANT, PARK DID NOT CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL, NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR-N-STOOL SAMPLES.

145, DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF WITH A PERIODIC LOSS OF EYE SIGHT IN RIGHT EYE, UNABLE TO EAT WITHOUT EXPERIENCING A FIT OF DIARRHEA, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DEFENDANT, PARK FOR MEDICAL CARE.

146. ON OR NEAR 10-3-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, BA 16 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

147. DEFENDANT, PARK ACKNOWLEDGED HE FULLY UNDERSTOOD THAT PLAINTIFF WAS DIPPING SEMEN TO SUCH EXTENT PLAINTIFF PANT LEG WAS SOAK WITH HIS SEMEN-AND DRIPPING INTO HIS SHOE; AND CHRONIC AILMENTS CITED ABOVE.

148, DEFENDANT, PARK, ASSESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED, MAKING REFERENCES TO THE NUMBER OF INCURABLE DISEASE, WHICH INEVITABLE WILL CAUSE PLAINTIFF DEATH IF NOT GIVEN MEDICINES TO CONTROL THE SYMPTOMS, SINCE PLAINTIFF WAS SUING HIM, HE WAS PENALIZING PLAINTIFF BY DENYING PLAINTIFF MEDICAL CARE.

149. DEFENDANT, PARK DECLARED, "I WISH YOU WOULD HURRY UP-N-DIE," "I WILL NOT GIVE MEDICAL CARE"; AND DID NOT CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB WORK ON BLOOD, URINE, SWAB, PAP SMEAR, STOOL SAMPLES

150, DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF SOAKED IN HIS OWN SEMEN FROM HIS CROUCH DOWN HIS PANT LEG DRIPPING INTO HIS SHOE; UNABLE TO EAT WITHOUT EXPERIENCING A FIT OF DIARRHEA, NO EYE SIGHT IN RIGHT EYE, NOT STOP EXCRUCIATING

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IATING PAIN-N- ~~EXTREME~~ DISCOMFORT, BEGGING DEFENDANT, PARK FOR MEDICAL CARE.

151. ON OR NEAR 10-17-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 15 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE, BASED ON NON-MEDICAL CARE.
152. UNABLE TO SEE OUT OF RIGHT EYE, AND CHRONIC AILMENTS CITED ABOVE DEFENDANT, PARK ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, "I KNOW YOU HAVE LIFE THREATENING HEALTH PROBLEMS, BUT I DON'T GIVE A DAMN IN THEY CAUSE YOUR DEATH," "I WILL NOT PROVIDE YOU MEDICAL CARE TO PENALIZE YOU FOR SUING ME
153. DEFENDANT, PARK DID NOT TAKE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR-N-STOOL SAMPLES
154. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF WITH NO EYE SIGHT IN RIGHT, UNABLE TO EAT WITH EXPERIENCING A FIT OF DIARRHEA, IN NON STOP EXCRUCIATING PAIN AND EXTREME DISCOMFORT, BEGGING DEFENDANT, PARK FOR MEDICAL CARE.
155. ON OR NEAR 10-28-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 15 CELL. DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE. BASED ON NON MEDICAL REASONS
156. DEFENDANT, PARK ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE FOR NEAR BLINDNESS IN RIGHT EYE-N-CHRONIC AILMENTS CITED ABOVE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM.
157. DEFENDANT, PARK DIDN'T AS MUCH AS CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR, STOOL SAMPLES
158. DEFENDANT, PARK, WALKED AWAY LEAVING PLAINTIFF WITH NEAR BLINDNESS IN RIGHT EYE, UNABLE TO EAT WITHOUT CAUSING A FIT OF DIARRHEA, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT BEGGING DEFENDANT, PARK FOR MEDICAL CARE

159. ON OR NEAR 10-24-14, DEFENDANT, P. DASCANI, DOCTOR, SICK CALL, GA 15 CELL. DEFENDANT, STATEMENT OF CLAIMS

- DASCANI DENIED PLAINTIFF MEDICAL CARE, BASED ON NON MEDICAL REASONS.
160. PLAINTIFF TOO WEAK TO STAND; AND CHRONIC ILLMENTS CITED ABOVE, DEFENDANT, DASCANI ACKNOWLEDGED HE FULLY UNDERSTOOD; PROCLAIMED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, EXCLAIMED, "ASK ME AGAIN; I WILL NOT PROVIDE YOU MEDICAL CARE, I DON'T WANT TO HEAR IT"; "I AM PENALIZING YOU FOR SUING THE WARDEN-N-SLT BREENE MEDICAL STAFF"
161. DEFENDANT, DASCANI INSTRUCTED PLAINTIFF TO REMOVE ALL CLOTHING.
162. DEFENDANT, DASCANI, DIDN'T EVEN CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, PAP SMEAR, SWAB-N-STOOL SAMPLES
163. WITH PLAINTIFF-N-SEVERAL OTHER INMATES THROUGHOUT BA POD BEGGING DEFENDANT, DASCANI PROFUSELY TO HELP PLAINTIFF, ALL TO NO AVAIL. DEFENDANT, DASCANI WALKED AWAY LEAVING PLAINTIFF DOWN ON THE FLOOR IN THE NUDE, GASPING ~~FOR~~ TO BREATHE ~~FOR~~ WEAK-N-DEHYDRATED FROM CONTINUOUS FITS OF DIARRHEA, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT BEGGING-N-PLEADING TO DEFENDANT, DASCANI FOR MEDICAL CARE.
164. ON OR NEAR 11-7-14, DEFENDANT, MS. E. MATTES, PAC, SICK CALL, BA 15 CELL, DEFENDANT, MS. MATTES DENIED PLAINTIFF MEDICAL CARE, BASED ON NON MEDICAL REASON
165. IN LIGHT OF CHRONIC ILLMENTS CITED ABOVE DEFENDANT, MS MATTES ASSESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED SHE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE, TO PENALIZE PLAINTIFF FOR SUING THE WARDEN-N-SLT-BREENE MEDICAL STAFF, SHE THOUGHT PLAINTIFF WOULD BE DEAD ALREADY
167. DEFENDANT, MS. MATTES CONDUCTED NO CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR-N-STOOL SAMPLES.
168. DEFENDANT, MS. MATTES WALKED AWAY LEAVING PLAINTIFF WEAK-N-DEHYDRATED, UNABLE TO EAT WITHOUT CAUSING FITS OF DIARRHEA, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT.
169. ON OR NEAR 11-14-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, BA 15 CELL DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

170. PLAINTIFF THE NAILS OOZING PUS-N-BLOOD, NEAR BLIND IN RIGHT EYE, AND CHRONIC AILMENTS CITED ABOVE, DEFENDANT, PARK ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED, "BUT YOU'RE OUT OF LUCK IF YOU EXPECT ME TO HELP YOU, I AM PENALIZING YOU FOR SUING ME, YOU CAN DIE FOR WHAT I CARE," "YOU ARE DENIED MEDICAL CARE", DEFENDANT, PARK TOLD PLAINTIFF

171. DEFENDANT, PARK DID NOT CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE, N-PUPIL DILATION, NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR N-STOOL SAMPLES,

172. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF WITH HIS TOENAILS DISCHARGING PUS-N-BLOOD NEAR BLIND IN RIGHT EYE, UNABLE TO EAT WITHOUT EXPERIENCING A FIT OF DIARRHEA, DEHYDRATED-N-WEAK, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DEFENDANT, PARK FOR MEDICAL CARE.

173. ON OR NEAR 11-24-14, DEFENDANT, P. DASCANI, DOCTOR, SICK CALL, GA 15 CELL, DEFENDANT, DASCANI DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

174. PLAINTIFF ANKLES SWOLLEN TO SUCH A DEGREE PLAINTIFF WAS FORCED TO WALK WITH PAIN, AND CHRONIC AILMENT CITED ABOVE, DEFENDANT, DASCANI PROFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING SCOTTSBURGH WARDEN-N-MEDICAL STAFF

175. DEFENDANT, DASCANI, INSTRUCTED PLAINTIFF TO REMOVE ALL CLOTHING, AND MAKE SEXUAL SEDUCTIVE POSES

176. DEFENDANT, DASCANI WALKED AWAY LEAVING PLAINTIFF NUDE, WITH ANKLES SWOLLEN TO NEAR TWICE THEIR SIZE MAKING IT PAINFUL TO STAND OR WALK, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT BEGGING DEFENDANT, DASCANI FOR MEDICINES FOR PAIN

177. ON OR NEAR 12-9-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 15 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

178. DEFENDANT, PARK ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE FOR DISCHARGE OF PUS-N-BLOOD FROM RIGHT EYE-N-LOSS OF EYE SIGHT IN RIGHT EYE, AND CHRONIC AILMENT CITED ABOVE, THEN HE RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM

179. DEFENDANT, PARK DID NOT CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, STATEMENT OF ~~STAFF~~ CLAIM

~~180~~. BREATHING PATTERN, HEART RATE, -N- PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, PAP SMEAR, SWAB -N- STOOL SAMPLES

180. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF WITH A DISCHARGE OF PUS-N-BLOOD FROM HIS RIGHT EYE -N- UNABLE TO SEE OUT OF RIGHT EYE, UNABLE TO EAT WITHOUT EXPERIENCING A FIT OF DIARRHEA, IN NON STOP EXCRUCIATING PAIN -N- EXTREME DISCOMFORT BEGGING DEFENDANT, PARK FOR EYE DROPS WHICH HE DENIED

181. ^{-N- E. MWaura} ON OR NEAR 12-10-14, DEFENDANT, MS. E. MATTES, PAC, SICK CALL, GA 15 CELL, DEFENDANT, MS. MWaura -N- MS. MATTES DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

182. DEFENDANTS, MS. MATTES -N- MS. MWaura ACKNOWLEDGED THEY FULLY UNDERSTOOD PLAINTIFF UNABLE TO SEE OF RIGHT EYE, WITH RIGHT EYE DISCHARGING PUS -N- BLOOD, ANKLES SWOLLEN TO NEAR TWICE THEIR SIZE WHEREIN WALKING OR STANDING WAS PAINFUL, AND CHRONIC ILLMENT CITED ABOVE; WARRANTED IMMEDIATE EMERGENCY MEDICAL CARE.

183. THEN DEFENDANTS, MS. MATTES -N- MS. MWaura RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED THEY WERE NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING THE WAR-DEN -N- SCI-GREENE MEDICAL STAFF, "YOU THINK YOU'RE EXPERIENCING NON STOP EXCRUCIATING IN-TESTINAL GRIPE -N- DIARRHEA, NOW WE'RE GOING TO TEACH YOU ABOUT SUING SCI-GREENE MEDICAL STAFF

184. WHAT FOLLOWS IS DEFENDANT, MS. MATTES -N- MS. MWaura PRESCRIBED THAT PLAINTIFF BE GIVEN ALL THREE MEALS ON A DAILY BASIS CONSISTING OF ONLY FOODS DEFENDANTS, MS. MATTES -N- MS. MWaura KNEW IN ADVANCE WOULD EXACERBATE PLAINTIFF INTESTINAL GRIPE -N- DIARRHEA.

185. DEFENDANTS, MS. MATTES -N- MS. MWaura DIDN'T EVEN CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE -N- PUPIL DILATION; NO LAB TEST ON BLOOD URINE, SWAB, PAP SMEAR -N- STOOL SAMPLES

186. DEFENDANTS, MS. MATTES -N- MS. MWaura WALKED AWAY LEAVING PLAINTIFF BLIND IN RIGHT EYE WHICH DISCHARGED PUS -N- BLOOD, FORCED TO WALK -N- STAND WITH PAIN DUE TO SWOLLEN ANKLES, IN NON STOP EXCRUCIATING PAIN -N- EXTREME DISCOMFORT BEGGING DEFENDANTS, MS. MATTES -N- MS. MWaura FOR EYE DROPS -N- PAIN MEDICINES, WHICH HE NEVER RECEIVED

187. ON OR NEAR 12-15-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, GA 15 CELL, DEFENDANT, STATEMENT OF CLAIM (33) W. V. G. 2:15-1031

PARK DENIED PLAINTIFF MEDICAL CARE, BASED ON NON MEDICAL REASONS.

188. DEFENDANT, PARK, PROFFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE FOR DISCHARGE OF PUS-N-BLOOD FROM RIGHT EYE-N-LITTLE OR NO EYE SIGHT IN RIGHT EYE, AND CHRONIC AILMENTS CITED ABOVE; THEN HE RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED, HE WOULDN'T PROVIDE PLAINTIFF MEDICAL CARE EVEN IF IT CAUSED PLAINTIFF DEATH, BECAUSE HE WAS PENALIZING PLAINTIFF FOR SUING HIM; DEFENDANT, PARK DENIED MEDICAL CARE.

189. DEFENDANT, PARK, DID NOT CONDUCT A CURSORY CHECK OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO LAB TEST ON BLOOD, URINE, SWAB, PAP SM-EAR-N-STOOL SAMPLES

190. DEFENDANT, PARK, WALKED AWAY LEAVING PLAINTIFF UNABLE TO SEE OUT OF HIS RIGHT EYE WHICH OOZED PUS-N-BLOOD, IN NONSTOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, BEGGING DEFENDANT, PARK FOR EYE DROP, WHICH DEFENDANT, PARK DENIED

191. ON OR NEAR 12-TH-5, DEFENDANTS, MS. F. MATTES, ^{-N-MS. F. MWaura} ^{UNREQUESTED VISIT} ~~PARC~~, GA 15 CELL, DEFENDANT, MS. MWaura-N-MS. MATTES DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

192. PLAINTIFF IN DETAIL ^{MADE} ~~DEFENDANTS~~ ^{-N-MS. MWaura} MS. MATTES, AWARE THAT THE DIET WHICH ^{THEY} ~~DEFENDANTS~~ PRESCRIBED FOR HIM, WITHOUT HIM REQUESTING-N-AGAINST HIS CONSENT, WAS CAUSING PLAINTIFF INTESINAL GRIPE TO BE EXACERBATED-N-MORE OCCURANCES OF VIOLENT DIARRHEA, AND THE DIET BE DISCONTINUED AT ONCE. DEFENDANTS, MS. MATTES-N-MS MWaura, BOTH ACKNOWLEDGED ^{THEY} ~~DEFENDANTS~~ FULLY ~~DEFENDANTS~~ UNDERSTOOD

193. DEFENDANTS, MS. MATTES-N-MS. MWaura RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED, WE KNOW YOU ARE NOW CURRENTLY RECEIVING THE DIET WE PRESCRIBED FOR YOU THREE TIMES A DAY. YOU ARE EXPERIENCING EVEN MORE PAIN BECAUSE OF IT, THAT'S GOOD. . . THAT WAS THE PURPOSE OF PRESCRIBING THIS PARTICULAR DIET FOR YOU, WE ARE GOING TO TEACH YOU A LESSON ABOUT SUING SOI-GREENE MEDICAL STAFF

194. ACCORDING TO DEFENDANTS, MS. MATTES-N-MWaura, WHEN PLAINTIFF SUE MEMBERS OF SOI-GREENE MEDICAL STAFF PLAINTIFF SUE THEM, TOO, AT THE SAME TIME.

195. PLAINTIFF AGAIN BEGGED THEM TO STOP THIS DIET, DEFENDANTS, MS. MATTES-N-STATEMENT OF CLAIM

MS. MWAURA RESPONDED WITH DELIBERATE INDIFFERENCE, HELD UP THE MIDDLE FINGER ON BOTH HAND WALKED AWAY LAUGHING OUT LOUD. DEFENDANTS, MS. MATTES - N - MS. MWAURA DID NOT DISCONTINUE THIS DIET. BASED ON NON MEDICAL REASON, DEFENDANTS, MS. MATTES - N - MWAURA ACTED IN CONCERT TO PENALIZE PLAINTIFF FOR SUING THE WARDEN - N - SCIEGRENE MEDICAL STAFF, BY DENYING PLAINTIFF MEDICAL CARE

196. ON OR NEAR 12-22-14, DEFENDANTS, P. DASCANI - N - MS. E. MWAURA, DOCTOR - N - PACS, SICK CALL, BA 15 CELL, DEFENDANTS, DASCANI - N - MS. MWAURA DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

197. CHRONIC AILMENTS CITED ABOVE DEFENDANTS, MR. DASCANI - N - MS. MWAURA ACKNOWLEDGED THEY FULLY UNDERSTOOD; PROFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, ~~THEY~~ RESPONDED WITH DELIBERATE INDIFFERENCE

198. DEFENDANTS, DASCANI - N - MS. MWAURA DECLARED, "YEA, YOU NEED IMMEDIATE EMERGENCY MEDICAL CARE, SO WHAT, YOU WON'T GET ANY MEDICAL CARE FROM US, WE ARE PENALIZING YOU FOR SUING THE WARDEN - N - SCIEGRENE MEDICAL STAFF," TALKING OVER PLAINTIFF AS THEY SPOKE. PLAINTIFF BEGGED FOR MEDICINE TO RELIEVE HIS PAIN, DEFENDANTS, MS. MWAURA - N - DASCANI, BOTH USED BOTH HANDS TO RAISE THE MIDDLE FINGER OF EACH HAND, HELD UP TO PLAINTIFF FACE, WITH A TWISTING MOTION

199. DEFENDANTS, DASCANI - N - MS. MWAURA, DID NOT MAKE CURSORY EXAM OF BLOOD, TEMPERATURE, BREATHING PATTERN, HEART RATE - N - PUPIL DILATION; NO LAB WORK ON BLOOD, URINE, SWAB, PAP SMEAR - N - STOOL SAMPLES

200. DEFENDANTS, DASCANI - N - MS. MWAURA WALKED AWAY LEAVING PLAINTIFF BEGGING FOR ~~THEIR~~ MEDICAL CARE, IN NON STOP EXCRUCIATING PAIN - N - EXTREME DISCOMFORT, FITS OF ONGOING DIARRHEA, NEAR BLIND IN RIGHT EYE

201. ON OR NEAR 12-23-14, DEFENDANTS, MS. E. MWAURA, PACS - N - ~~B. JIN~~, JIN, DOCTOR, DEFENDANTS, MS. MWAURA - N - JIN, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

202. PLAINTIFF PROVIDED A DETAIL DESCRIPTION OF CHRONIC AILMENTS CITED ABOVE; DEFENDANTS, MS. MWAURA - N - JIN, TALKING OVER PLAINTIFF TO DECLARE PLAINTIFF STATEMENT OF CLAIMS:

NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, WHOOPEE DO, THEY WERE NOT PROVIDING PLAINTIFF MEDICAL CARE. PLAINTIFF WAS IN PAIN-N-SUFFERING, THAT IS EXACTLY WHAT THEY WANTED, BECAUSE THEY WERE PENALIZING PLAINTIFF FOR SUING DEFENDANTS, JIN-N-SCI-BREENT MEDICAL STAFF

203. DEFENDANTS, MS. MWaura-N-JIN, DIDNT TAKE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION, NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR-N-STOOL SAMPLES

204. DEFENDANTS, MS. MWaura-N-JIN RESPONDED TO PLAINTIFF REQUEST FOR MEDICINE TO EASE THE PAIN, WITH DELIBERATE INDIFFERENCE; BY USING BOTH HANDS HELD UP THEIR MIDDLE FINGER TO PLAINTIFF, DECLARED, ROTATE ON IT.

205. DEFENDANTS, MS. MWaura-N-JIN, WALKED AWAY LEAVING PLAINTIFF IN NON STOP AGONIZING PAIN-N-DISCOMFORT, UNABLE TO AVOID THE EXPERIENCE OF FITS OF DIARRHEA, NEAR BLIND IN RIGHT EYE

206. ON OR NEAR 12-29-14; DEFENDANT, M. PARK, DOCTOR, SICK CALL, BA 15 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

207. BARELY ABLE TO STAND; AND CHRONIC ILLMENTS CITED ABOVE, PROCLAIMED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, RESPONDED WITH DELIBERATE INDIFFERENCE. DECLARED HE WAS PENALIZING PLAINTIFF FOR SUING HIM, SO HE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE.

208. IN THE PROCESS OF BEGGING DEFENDANT, PARK TO PRESCRIBE FOR HIM MEDICINE FOR PAIN PLAINTIFF COLLAPSED WITH DEFENDANT, PARK ~~was~~ LOOKING ON. DEFENDANT, PARK DIDNT EVEN CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR-N-STOOL SAMPLES

209. DEFENDANT, M. PARK WALKED AWAY LEAVING PLAINTIFF SPRAWLED OUT ON THE FLOOR FACE DOWN GASPING FOR AIR, IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT,

210. ON OR NEAR 12-30-14, DEFENDANT, M. PARK, DOCTOR, SICK CALL, BA 15 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE. BASED ON NON MEDICAL REASON

211. DUE TO LACK OF STRENGTH PLAINTIFF HAD TO COME TO HIS DOOR BY PLACING HIS HANDS ON STATEMENT OF CLAIMS

THE WALL; AND CHRONIC ILLMENTS CITED ABOVE, WHEN DEFENDANT, PARK WITNESS THIS HE ASKED PLAINTIFF IF HE COULD STAND WITHOUT PLACING HIS HAND ON THE WALL; WHEN PLAINTIFF ANSWERED NO; DEFENDANT, PARK ASKED WHY, PLAINTIFF, ANSWERED, I AM TOO WEAK TO DO SO.

212. DEFENDANT, PARK DECLARED PLAINTIFF NEEDED, IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM

213. DEFENDANT, PARK DID NOT DO A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, SWAB, PAP SM-
EAR-N-STOOL SAMPLES

214. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF TOO WEAK TO STAND WITHOUT PLAC-
ING BOTH HANDS ON THE WALLS; NEAR BLIND IN RIGHT EYE, IN NON STOP EXCRUCIATING PAIN.

215. ON OR NEAR 1-7-15, DEFENDANT, M PARK, DOCTOR, SICK CALL, GA 15 CELL, DEFEND-
ANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

216. DEFENDANT, PARK PROFESSED PLAINTIFF CHRONIC ILLMENTS CITED ABOVE WARRANT-
ANTED IMMEDIATE EMERGENCY MEDICAL CARE; RESPONDED WITH DELIBERATE INDIFF-
ERENCE, DECLARED HE WAS PENALIZING PLAINTIFF FOR SUING HIM, SO HE WOULD NOT
PROVIDE MEDICAL CARE

217. DEFENDANT, PARK PROVIDED NO CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATH-
ING PATTERN, HEART RATE-N-PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, SWAB, PAP
SM-
EAR-N-STOOL SAMPLES

218. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN-
N-EXTREME DISCOMFORT

219. ON OR NEAR 1-8-15, DEFENDANT, M, PARK, DOCTOR, SICK CALL, GA 15 CELL. DEFENDANT,
PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.

220. CHRONIC ILLMENTS CITED ABOVE ASSESSED BY DEFENDANT, PARK WARRANTED
IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE
INDIFFERENCE, DECLARED, HE WOULD NOT PROVIDE MEDICAL CARE TO PENALIZE
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PLAINTIFF FOR SUING HIM.

221. DEFENDANT, PARK DID NOT CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE, -N- PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR -N- STOOL SAMPLES
222. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF IN NON STOP EXCRUCIATING PAIN -N- EXTREME DISCOMFORT, STRUGGLING TO BREATHE, UNABLE TO EAT WITHOUT INCURRING ITS OF DIARRHEA
223. ON OR NEAR 1-14-15, DEFENDANT, M. PARK, DOCTOR, SICK CALL, BA 15 CELL, DEFENDANT, PARK DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS
224. ASSESSED CHRONIC ALLMENTS CITED ABOVE WARRANTED ~~THE~~ IMMEDIATE EMERGENCY MEDICAL CARE, DEFENDANT, PARK RESPONDED WITH DELIBERATE INDIFFERENCE DECLARED HE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING HIM
225. DEFENDANT, PARK DID NOT MAKE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE -PUPIL DILATION; NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR -N- STOOL EXAMPLES
226. DEFENDANT, PARK WALKED AWAY LEAVING PLAINTIFF UNABLE TO WALK, UNABLE TO EAT WITHOUT EXPERIENCING DIARRHEA, IN A STATE OF NON STOP EXCRUCIATING PAIN -N- EXTREME DISCOMFORT
227. ON OR NEAR 1-21-15, DEFENDANT, MS. E. MWaura, PACS, SICK CALL, BA 15. DEFENDANT, MS. MWaura DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS.
228. EXPERIENCING NON STOP EXCRUCIATING PAINFUL INTESTINAL CRIPS MAKING SLEEP NEAR NON EXISTENTIAL FOR ~~THE~~ PAST FOUR STRAIGHT DAYS; AND CHRONIC ALLMENTS CITED ABOVE; ~~THE~~
229. DEFENDANT, MS. MWaura ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, DECLARED SHE WOULD NOT ~~PROVIDE~~ PROVIDE PLAINTIFF MEDICAL CARE, TO PENALIZE PLAINTIFF FOR SUING THE WARDEN -N- SOL-BRENE MEDICAL STAFF.
230. DEFENDANT, MS. MWaura, DECLARED, SHE IS A PROUD MEMBER OF SOL-BRENE MEDICAL STAFF WHEN PLAINTIFF SUED MEMBERS OF SOL-BRENE MEDICAL STAFF, SO PLAINTIFF SUED HER, TOO, SO SHE IS PENALIZING PLAINTIFF FOR DOING SO.
231. PAIN SO GREAT PLAINTIFF HAD DIFFICULTY STANDING WITHOUT THE AID OF LEANING AGAINST THE DOOR OR THE WALL
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232. DEFENDANT, MS. MWAURA WAS ASKED BY PLAINTIFF TO GIVE HIM MEDICINE FOR PAIN, DEFENDANT, MS. MWAURA RESPONDED WITH DELIBERATE INDIFFERENCE, LAUGHED, AND SAID YOU ARE IN PAIN, I'M BLAD OF IT

234. DEFENDANT, MS. MWAURA, DIDNT CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE - N- PUPIL DILATION, NO LAB TEST OF BLOOD, URINE, PAPSMEAR, SWAB - N- STOOL SAMPLES

235. DEFENDANT, MS. MWAURA WALKED AWAY AS SHE RAISED THE MIDDLE FINGER OF BOTH HANDS LEAVING PLAINTIFF ~~SO~~ WEAK HE CAN ONLY STAND WITH SUPPORT OF HIS WALL - N- DOOR, IN NON STOP EXCRUCIATING PAIN - N- EXTREME DISCOMFORT, UNABLE TO EAT WITHOUT EXPERIENCING DIARRHEA

236. ON OR NEAR 1-28-15, DEFENDANT, MS. E. MWAURA, PAC, SICK CALL, GA 15 CELL. DEFENDANT, MS. MWAURA DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

237. PLAINTIFF TOE NAILS OOOZED PUS - N- BLOOD TO SUCH EXTENT IT STAINED THE TOP OF HIS SNEAKERS, AND CHRONIC AILMENTS CITED ABOVE, DEFENDANT, MS. MWAURA ACKNOWLEDGED SHE FULLY UNDERSTOOD, PROFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, RESPONDED WITH DELIBERATE INDIFFERENCE, DECLARED SHE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING SCI-GREENE MEDICAL STAFF, HER FAMILY

238. DEFENDANT, MS. MWAURA DIDNT MAKE A CURSORY EXAM OF BLOOD, TEMPERATURE, BREATHING PATTERN, HEART RATE - N- PUPIL DILATION, NO LAB TEST ON BLOOD, URINE, SWAB, PAPSMEAR - N- STOOL SAMPLES

239. DEFENDANT, MS. MWAURA WALKED AWAY LEAVING PLAINTIFF WITH PUS - N- BLOOD OZZING FROM HIS TOE NAILS, UNABLE TO EAT WITHOUT EXPERIENCING DIARRHEA, IN NON STOP EXCRUCIATING PAIN - N- DISCOMFORT.

240. ON OR NEAR 2-4-15, DEFENDANT, MS. E. MATTES, PACS, SICK CALL, GA-15 CELL, DEFENDANT, MS. MATTES DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASON

241. NON STOP EXCRUCIATING PAINFUL INTESTINAL GRIPE TO SUCH A DEGREE PLAINTIFF WAS FORCED TO WALK BENDING AT THE WAIST, AND WHILE SHARING THIS CONVERSATION WITH DEFENDANT, MS. MATTES, PLAINTIFF COLLAPSED, AND CHRONIC AILMENT ^{CITED ABOVE} DEFENDANT, MS. MATTES WITNESSED PLAINTIFF CONDITION, ACKNOWLEDGED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE ~~BY THE MEDICAL STAFF~~ THEN RESPONDED WITH DELIBERATE INDIFFERENCE

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292. DEFENDANT, MS. MATTES DECLARED SHE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING MEMBERS OF SCI-GREENE MEDICAL STAFF

293. DEFENDANT, MATTES, DID NOT TAKE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE -N- PUPIL DILATION, NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR -N- STOOL SAMPLES.

294. DEFENDANT, MS. MATTES WALKED AWAY LEAVING PLAINTIFF IN SO MUCH PAIN NON STOP HE WAS UNABLE TO STAND WITHOUT BENDING AT THE WAIST UNABLE TO EAT WITHOUT INCURRING DIARRHEA.

295. ON OR NEAR 2-18-15, DEFENDANT, MS. E. MATTES, PACS, SICK CALL, GA 15 CELL, DEFENDANT, MS. MATTES DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

296. COMPLETE LOSS OF EYE SIGHT IN RIGHT, AND CHRONIC ILLNESS CITED ABOVE, DEFENDANT, MS. MATTES ACKNOWLEDGED SHE FULLY UNDERSTOOD, PROFESSED PLAINTIFF NEEDED IMMEDIATE EMERGENCY MEDICAL CARE, BUT RESPONDED WITH DELIBERATE INDIFFERENCE

297. DEFENDANT, MS. MATTES DECLARED, SHE WANT PLAINTIFF TO GO ON EXPERIENCING PAIN PAIN, DEFENDANT, MS. MATTES BEGAN TO CLAP -N- LAUGH UNCONTROLLABLY, YES, YOU'RE IN PAIN, THAT'S WHAT I WANT IS YOU SUFFERING IN ~~THE~~ UNREMITTENT PAIN, DEFENDANT, MS. MATTES, SHOUTED I WILL SEE TO IT THAT YOU CONTINUE TO BE IN PAIN. DECLARED, SHE WAS NOT PROVIDING PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING THE WARDEN -N- SCI-GREENE ~~MEDICAL~~ MEDICAL STAFF

298. DEFENDANT, MS. MATTES DIDNT MAKE A CURSORY EXAM OF BLOOD PRESSURE, TEMPERATURE, BREATHING PATTERN, HEART RATE -N- PUPIL DILATION, NO LAB TEST ON BLOOD, URINE, SWAB, PAP SMEAR -N- STOOL SAMPLES

299. DEFENDANT, MS. MATTES WALKED AWAY HOLDING UP THE MIDDLE FINGER ON BOTH HANDS, LEAVING PLAINTIFF BLIND IN RIGHT EYE, UNCHAINED DIARRHEA, IN NON STOP EXCRUCIATING PAIN -N- EXTREME DISCOMFORT

300. ON OR NEAR 2-23-15, DEFENDANT, MS. E. MWAWURA, PACS, SICK CALL, GA 15 CELL, DEFENDANT, MS. MWAWURA DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS

301. CHRONIC ILLMENT CITED ABOVE DEFENDANT, MS. E. MWAWURA ACKNOWLEDGED PLAINTIFF WARRANT IMMEDIATE EMERGENCY MEDICAL CARE, THEN RESPONDED WITH DELIBERATE INDIFFERENCE DECLARE SHE WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING SCI-GREENE MEDICAL STAFF AND THE WARDEN

302. DEFENDANT, MS. MWAWURA DECLARED, TO PLAINTIFF, "YOU CAN DIE FOR WHAT I STATEMENT OF CLAIMS